

FACT SHEET FOR NPDES PERMIT WA-003209-3
PROJECT NAME: Northwest Pipeline Corporation

This fact sheet is a companion document to National Pollutant Discharge Elimination System (NPDES) Permit No. WA-003209-3. This permit is issued to Northwest Pipeline Corporation to authorize the discharge of stormwater, uncontaminated dewatering water associated with construction activity and hydrostatic test water from the Northwest Pipeline Corporation construction project to receiving water bodies listed in Appendix C, Table 1, and ground water through infiltration. This fact sheet establishes the basis for requirements which are included in the permit (discharge locations are listed in Appendix C, Table 4).

GENERAL INFORMATION

Applicant:	Northwest Pipeline Corporation 2800 Post Oak Blvd. Houston, TX 77056
Site Name and Address:	Northwest Pipeline Corporation Western Washington (Linear project from Sumas in Whatcom County through Skagit, Snohomish, King, Pierce, Thurston, Lewis, Cowlitz Counties to Washougal in Clark County)
Type of Facility:	Pipeline Installation Construction-Related Activity
Discharge Locations:	For discharge of construction stormwater and dewatering water to surface water bodies—Appendix C, Table 1 For discharge of hydrostatic test water—Appendix C, Table 4

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PARTS I AND II

INTRODUCTION

The Federal Clean Water Act (CWA, 1972, and later modifications, 1977, 1981, and 1987) established water quality goals for the navigable (surface) waters of the United States. One of the mechanisms for achieving the goals of the CWA is National Pollutant Discharge Elimination System (NPDES) permits program, which is administered by the Environmental Protection Agency (EPA). The EPA has delegated responsibility to administer the NPDES permit program to the State of Washington on the basis of Chapter 90.48 RCW which defines the Department of Ecology's authority and obligations in administering the wastewater discharge permit program.

The regulations adopted by the state include procedures for issuing permits (Chapter 173-220 WAC), water quality criteria for surface and ground waters (Chapters 173-201A and 200 WAC), and sediment management standards (Chapter 173-204 WAC). These regulations require that a permit be issued before discharge of wastewater and stormwater associated with industrial activity to waters of the state is allowed. The regulations also establish the basis for effluent limitations and other requirements which are to be included in the permit. One of the requirements (WAC 173-220-060) for issuing a permit under the NPDES permit program is the preparation of a draft permit and an accompanying fact sheet. Public notice of the availability of the draft permit is required at least thirty (30) days before the permit is issued (WAC 173-220-050). The fact sheet and draft permit are available for review (see Appendix A—Public Involvement of the fact sheet for more detail on the public notice procedures). Definitions for both the permit and fact sheet are contained in Appendix B of the fact sheet.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in this review have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in Appendix D—Response to Comments.

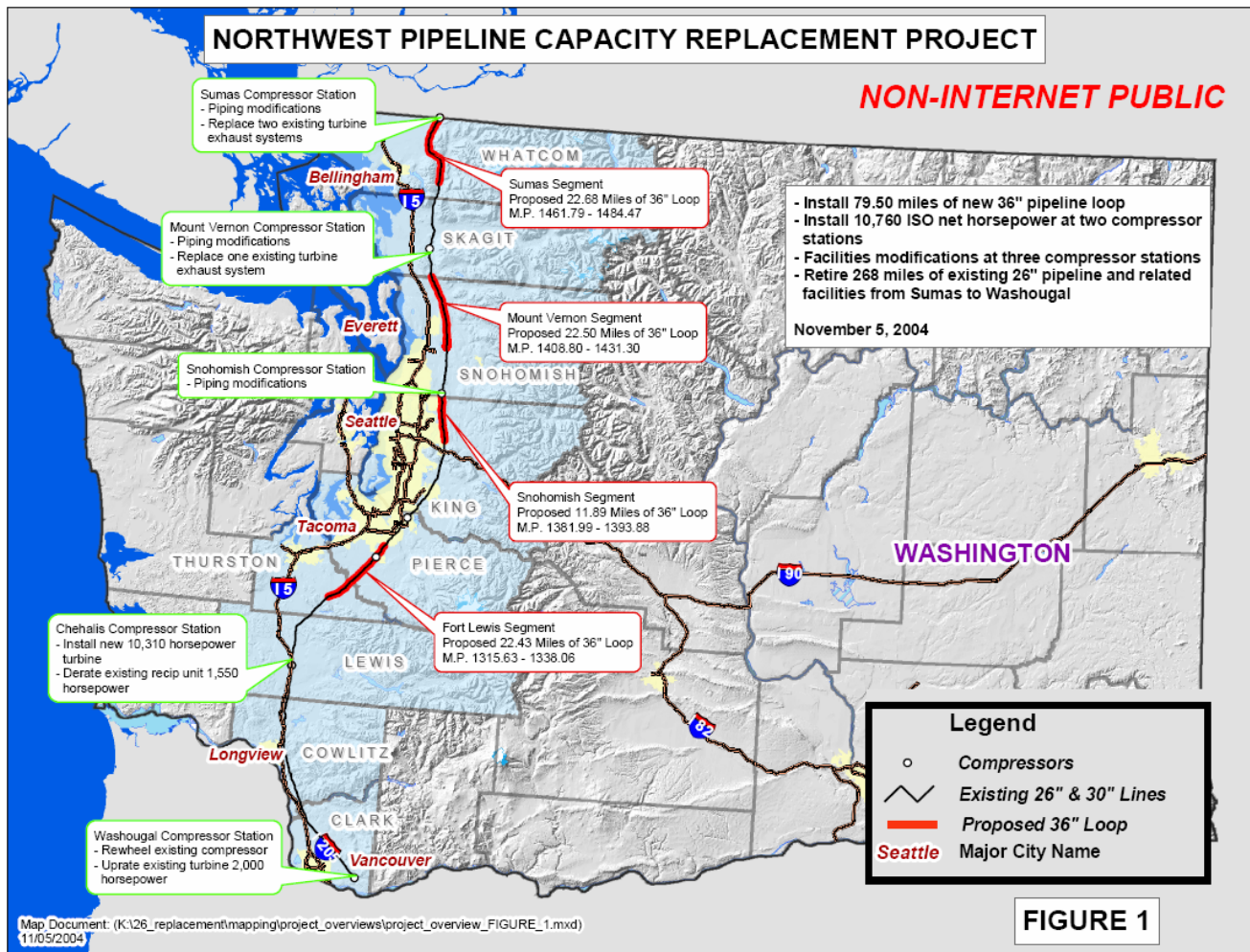
This permit is written in two parts. Part I is regulatory requirements for construction stormwater runoff and dewatering activities and Part II is regulatory requirements for hydrostatic test water. The general conditions are equally applicable to Parts I and II.

DESCRIPTION OF THE PROJECT

Northwest Pipeline Corporation (Northwest), a Williams Gas Pipeline Company, proposes to construct, modify and operate below and above ground facilities to replace the delivery capacity of its existing 268-mile-long, 26-inch-diameter pipeline in the Interstate 5 corridor between Sumas (Whatcom County) and Washougal (Clark County), Washington (Capacity Replacement Project). Northwest will install approximately 79.50 miles of 36-inch-diameter pipeline and provide 10,760 ISO net horsepower (hp) of compression to replace the delivery capacity of the 26-inch pipeline. Northwest also operates a 30-inch pipeline paralleling the 26-inch line, as well as four existing 36-inch loop segments installed during the Evergreen Expansion Project. Once the new 36-inch facilities are installed, Northwest will disconnect the 268-mile, 26-inch pipeline and retire the 26-inch pipeline generally in-place.

Approximately 1,024 acres will be disturbed for construction of the replacement pipeline. The general location of the pipeline is shown in Figure 1. The construction right-of-way will parallel Northwest's existing easements for over 96 percent of the route. Northwest will fully retain its current easement rights or acquire new rights as required to continue operation of the 30- and 36-inch pipelines.

Figure 1. General Location of Northwest Pipeline System Project



A. CONSTRUCTION OF PIPELINE SEGMENTS OR LOOPS

Four separate loops (totaling 79.50 miles) are proposed that would be placed parallel to and are interconnected with Northwest's existing 30-inch pipeline. The four pipeline segments (also referred to as loops) are located at the following locations:

LOOP	LOCATION	MILEPOST	LENGTH (MILES)
Sumas Loop	Whatcom County	1461.79-1484.47	22.68
Mt. Vernon Loop	Skagit County, Snohomish County, City of Lake Stevens	1408.76-1431.30	22.54
Snohomish Loop	Snohomish County, King County, City of Redmond and City of Sammamish	1381.99-1393.88	11.89
Ft. Lewis Loop	Fort Lewis Military Reservation*, Pierce County, Thurston County	1315.63-1339.25	23.62

* Covered under an NPDES permit which is issued by EPA – Region X.

Construction of the pipeline will consist of the following primary activities: clearing of the 95-foot wide construction right-of-way, salvaging topsoil from over the trenchline for use in restoring the site, excavating a trench and windrowing the spoil adjacent to the trench, placing a 36-inch diameter natural gas pipe in the trench, backfilling the trench and restoring the site to its original contours. Revegetation will be performed as necessary. Staging areas will be located along the route where extra space outside of the construction right-of-way is required.

After backfilling, the pipeline will be hydrostatically tested in accordance with U.S. Department of Transportation regulations to ensure that the system is capable of operating at the design pressure.

B. CONSTRUCTION AT COMPRESSOR STATIONS

The project also includes modifying and/or expanding aboveground facilities at the existing compressor stations. Construction activities and storage of construction materials and equipment will be confined within the compressor station sites. In general, construction would begin with site grading, laying of building foundations and pipe support piers, installation of equipment and piping, and the erection of permanent buildings. After completion of service lines, pipe tie-ins and testing, final construction would consist of painting aboveground facilities, road surfacing, grading, and gravelling the station yard. All the sand blasting and painting operations will be conducted in an enclosed structure and the waste generated will be disposed of in a manner to avoid any contact with the storm water or surface water.

COMPRESSOR STATION	COUNTY	CONSTRUCTION ACTIVITY
Sumas Compressor Station	Whatcom County	<ul style="list-style-type: none">• Install new 10, 310 horsepower (hp) turbine• Retire 8,000 hp reciprocating unit• Piping modification• Replacement of exhaust ducting and silencers
Mt. Vernon Compressor Station	Skagit County	<ul style="list-style-type: none">• Uprate existing C plant turbine to 1,780 hp• Rewheel existing B Plant compressor• Piping modification• Replacement of exhaust ducting and silencers
Snohomish Compressor Station	Snohomish County	<ul style="list-style-type: none">• Uprate existing turbine to 1780 hp• Piping modification
Chehalis Compressor Station	Lewis County	<ul style="list-style-type: none">• The station will be expanded by about 1.2 acres• Install new 10, 310 hp turbine• Modify existing reciprocating unit• Piping modification
Washougal Compressor Station	Clark County	<ul style="list-style-type: none">• Rewheel and uprate existing compressor turbine to 2,000 hp

For Sumas, Mt. Vernon, Snohomish and Washougal Compressor Stations, Northwest Natural Gas Pipeline System will utilize existing access roads for equipment and personnel ingress and egress. No new access roads or road improvements are required. No additional temporary extra work space outside the fenced station yard will be utilized. No new utilities will be required.

Construction activities at the Chehalis Compressor Station will require the most time and are expected to begin in March 2006 and would take approximately eight months to complete. The station will be expanded by about 1.2 acres. The station expansion and extra work spaces will occur on Northwest's property.

The compressor stations and metering stations listed in Appendix C, Table 2, have a history of mercury presence through the use of manometers or thermowells. These sites will be investigated and cleaned prior to the start of construction. The sampling plan developed by the Permittee and approved by Ecology has adequate sampling density and probability for detecting most of the contaminated areas. However, this sampling plan does not cover 100 percent of the contaminated sites. Therefore, the permit, under Section S1.C, Part I, contains additional requirements for mercury monitoring to ensure compliance with the water quality criteria for this parameter. This additional monitoring requirement is to protect the water quality of the receiving water during construction activities from areas that might have received mercury contamination as a result of manometers or thermowells use.

C. RETIREMENT OF EXISTING PIPELINE

The project also disconnects the 26-inch diameter pipeline at 24 locations along the proposed loop and 48 other locations along the remainder of Northwest's existing system between Sumas and Washougal, Washington. These sites are small and will be confined to the existing easement. The locations and sizes of the temporary extra work spaces associated with these facilities are listed in Appendix C, Table 3. Northwest Pipeline will utilize up to 13-pipe storage and contractor yards on a temporary basis. (The sizes and locations of the yards identified by Northwest Pipeline are listed in FEIS, page 2-17, Table 2.2.4-1.)

D. WATER BODY CROSSING

A total of 154 water bodies, including 55 perennial water bodies and 99 intermittent streams or ditches would be crossed by the loops associated with the Capacity Replacement Project. The water bodies that would be crossed and Northwest's proposed crossing method for each are listed in Table K-1 in Appendix K of FEIS. The NPDES permit will provide coverage for upland construction work associated with the waterbody crossings (the in-water work associated with the waterbody crossings will be covered under the 401 Certification, issued by the Department of Ecology).

SCHEDULE

Pipeline construction is primarily scheduled to commence in March of 2006 and will require approximately 8 months to complete. However, Northwest proposes to install three horizontal directional drills (HDDs) in late 2005, which will be covered under NPDES general permit. In addition, Northwest plans to begin preparing yards to receive pipe and materials at offsite yards in January 2006. New facilities are planned for an in-service date of November 1, 2006. Restoration of construction disturbance is expected to be complete in the fall of 2007.

Northwest is an interstate pipeline company operating in the state of Washington, construction and operation of this pipeline falls under the jurisdiction of the Federal Energy Regulatory Commission (FERC). Northwest is required to comply with the FERC's standard conditions as they apply to natural gas pipelines including the FERC's Wetland and Waterbody Construction and Mitigation Procedures and the Upland Erosion Control and Revegetation Plan.

PART I—STORMWATER ASSOCIATED WITH CONSTRUCTION ACTIVITIES

DESCRIPTION OF THE RECEIVING WATER

The **Sumas Loop** crosses 78 water bodies, of which 24 are perennial, including Saar Creek (2 crossings), Tributary to Lake Creek (2 crossings), Kinney Creek, Breckenridge Creek, Tributary to the Sumas River (4 crossings), Dale Creek, Smith Creek, Tributary to Macaulay Creek, Macaulay Creek, Mitchell Creek and 3 of its tributaries, Jim Creek, North Fork Nooksack River, Tributary to South Fork Nooksack River (2 crossings), Tributary to Black Slough, and Tinling Creek.

The **Mt. Vernon Loop** will cross a total of 33 water bodies, of which 12 are perennial, including Pilchuck Creek, Armstrong Creek, North Fork Stillaguamish River, South Fork Stillaguamish River, Eagle Creek, Tributary to South Fork Stillaguamish River, Olson Lake, Star Creek, Tributary to Little Pilchuck Creek, Little Pilchuck Creek (2 crossings) and Catherine Creek.

The **Snohomish Loop** crosses 20 water bodies, of which 13 are perennial, including five crossings of Tributary to Paradise Lake/Bear Creek, Struve Creek, Colin Creek, Tributary to Seidel Creek (2 crossings), Tributary to Evans Creek (3 crossings) and Evans Creek.

The **Ft. Lewis Loop** crosses 15 water bodies, of which five are perennial, including Muck Creek, Lacamas Creek, Murray Creek, the Nisqually River and the Centralia Power Canal. Lists of waterbody crossed by Northwest Pipeline Natural Gas Pipeline System are provided in Appendix K (rivers and streams) and Appendix J (wetlands) of FEIS (FEIS is available at: http://www.ecy.wa.gov/programs/sea/nw_capacity_replacement/pdf/final/)

DESCRIPTION OF DISCHARGE

Potential discharges to receiving waters that may occur during construction include stormwater run off, water from trench dewatering, and hydrostatic test water.

Storm Water

There is a potential for pollutants to be present in stormwater discharges. These include sediment, hydrocarbons from vehicle fueling and maintenance, pH, and mercury. The potential sources for mercury discharge are compressor stations and metering stations. These stations have a history of mercury presence through the use of manometers or thermowells. Northwest Pipeline has agreed to voluntarily cleanup these polluted sites before the commencement of construction. However, the sampling plan for mercury clean-up cannot practically include 100 percent of all contaminated areas. Because of the serious health effects of mercury, additional monitoring requirements are included in Section S1.C of the permit.

Dewatering Water

Dewatering would be conducted as necessary and is dependent upon seasonal groundwater conditions and precipitation from a storm event. No water from trench dewatering will be discharged directly to surface waterbodies. Northwest plans to release trench dewatering to areas where the water will infiltrate. All water released as a result of trench dewatering will be released through a discharge structure. However, depending on site conditions, it is possible that the water could channel and reach flowing water. The Permittee reported that it is not possible, prior to construction, to determine the locations for trench dewatering because this will depend on conditions in the field at the time of construction (i.e., seasonal groundwater levels) and the need for dewatering to access the trench. Procedures for mitigating any impact to flowing water as a result of dewatering are included in the General SWPPP for this project (see General SWPPP, Section 10.1).

Part II—HYDROSTATIC TEST WATER DISCHARGE

DESCRIPTION OF THE PROJECT

Northwest proposes to conduct a series of hydrostatic tests to verify the integrity of the newly constructed 36-inch pipeline. These tests involve filling the pipeline with water, pressurizing it, and then checking for pressure losses due to pipeline leakage. Approximately 21,380,000 gallons of water will be used to hydrostatically test the loops (see table below). Of this total, up to 6,060,000 gallons of water would be withdrawn from a surface water source (the Centralia Canal) for the Fort Lewis Loop. Water withdrawal from surface waterbodies is covered in the Hydraulic Project Approval and Temporary Water Use permit issued by the WDFW and WDOE, respectively. The remaining 15,320,000 gallons of water would be obtained from municipal sources.

Summary of Potential Hydrostatic Test Water Sources and Volumes for the Capacity Replacement Project		
Facility	Source	Volume (gallons)
Sumas Loop	Sumas Water District	3,030,000
	City of Acme Water District	3,030,000
Mount Vernon Loop	City of Arlington	3,030,000
	Snohomish Public Utility District	3,030,000
Snohomish Loop	Hydrant at the Snohomish Compressor Station	3,200,000
Fort Lewis Loop	Centralia Canal	6,060,000

DESCRIPTION OF DISCHARGE AND LOCATIONS

After completion of a test section, the water used would be pumped to another section for reuse to test another loop whenever possible and then discharged to ground via infiltration. The proposed locations of the discharge are listed in Appendix C, Table 4. The discharge is required to be analyzed to meet the effluent limits set forth in the permit prior to discharge to ground or land surface. Treatment will be provided as necessary. The hydrostatic test water would be discharged into dewatering structures (hay bale structures or sand filter bags system) for infiltration. The dewatering structures would be located in upland areas adjacent to the construction right-of-way at a significant distance from wetlands and water bodies. The discharge rate would be controlled to prevent the water from flowing over the top of the dewatering structures and becoming a point source discharge.

PART I—PROPOSED PERMIT LIMITATIONS FOR THE STORMWATER ASSOCIATED WITH CONSTRUCTION ACTIVITIES

Federal and state regulations require that effluent limitations set forth in an NPDES permit must be either technology- or water quality-based. Technology-based limitations are based upon the treatment methods available to treat specific pollutants. Technology-based limitations are set by regulation or developed on a case-by-case basis (40 CFR 125.3, and Chapter 173-220 WAC). Water quality-based limitations are based upon compliance with the Surface Water Quality Standards (Chapter 173-201A WAC), Ground Water Quality Standards (Chapter 173-200 WAC), Sediment Quality Standards (Chapter 173-204 WAC) or the National Toxics Rule (Federal Register, Volume 57, No. 246, Tuesday, December 22, 1992). The more stringent of these two limits must be chosen for each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

Discharges of storm water must meet all applicable provisions of Sections 301 and 402 of the Clean Water Act (CWA). These provisions require control of pollutant discharges to a level equivalent to Best Available Technology Economically Achievable (BAT) for toxic and unconventional pollutants, and Best Conventional Pollutant Control Technology (BCT) for conventional pollutants, and any more stringent limitations necessary to meet water quality standards. In addition, state law requires discharges to apply all known available and reasonable methods of prevention and treatment (AKART) to prevent and control the pollution of the waters of the state of Washington. State law also requires any other more stringent limitations necessary to meet all applicable state standards.

The sand and gravel industry is engaged in significant land disturbing activities, such as earth movement, excavation, mining, and washing and sorting of aggregate. In 1994, a new Sand and Gravel General Permit was developed by Ecology in which a discharge limit of 50 NTU for turbidity, via conventional sedimentation, was established. Over the last ten years this similar source category has demonstrated the 50 NTU limit to be achievable. In 1998, Ecology first issued an Individual Construction Stormwater Permit which was based on the general permit but also required discharge monitoring. A review of available data from eight individual construction stormwater permitted facilities showed that more than 90 percent of the discharge data met 50 NTU limit. Therefore, an AKART determination by the Department of Ecology has resulted in an effluent turbidity limit of 50 NTUs.

If the Permittee has difficulty meeting the technology-based limit for turbidity (nonchemical treatment) of 50 NTU or the water quality-based limit through conventional treatment, then the Permittee may elect to use enhanced treatment (i.e. chemical treatment and/or sand filtration) to meet these limits.

The permit requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) which includes Best Management Practices (BMPs) to prevent the pollution of storm water and to reduce the amount of pollutants discharged. Development of an adequate SWPPP and full implementation of BMPs constitutes implementation of BAT, BCT, and AKART. SWPPP should be updated annually to reflect the different phases of construction.

The Permittee is required to use the Department of Ecology's August 2005 Stormwater Management Manual for Western Washington (SWMM), or an equivalent manual, to make a judgment of which BMPs are necessary to achieve compliance with the BAT and BCT requirements of the CWA, as well as the AKART requirements of state law. The SWPPP must include a description of stabilization and structural practices to be used at the site to minimize erosion and the movement of sediments on and from the site. The SWPPP will be submitted to the Department for review.

The discharge of process wastewater, domestic wastewater, or noncontact cooling water to a storm drain or surface waters is prohibited. Illicit discharges are not authorized, including spills of oil or hazardous substances, and obligations under state and federal laws and regulations pertaining to those discharges apply.

SURFACE WATER QUALITY-BASED EFFLUENT LIMITATIONS

In order to protect existing water quality and preserve the designated beneficial uses of Washington's surface waters, WAC 173-201A-060 states that waste discharge permits shall be conditioned such that the discharge will meet established surface water quality standards. The Washington State Surface Water Quality Standards (Chapter 173-201A WAC) is a state regulation designed to protect the beneficial uses of the surface waters of the state. Surface water quality-based effluent limitations may be based on an individual waste load allocation (WLA) or on a WLA developed during a basin wide total maximum daily loading study (TMDL).

Numerical Criteria for the Protection of Aquatic Life

"Numerical" water quality criteria are numerical values set forth in the state of Washington's Water Quality Standards for Surface Waters (Chapter 173-201A WAC). They specify the levels of pollutants allowed in a receiving water while remaining protective of aquatic life. Numerical criteria set forth in the water quality standards are used along with chemical and physical data for the wastewater and receiving water to derive the effluent limits in the discharge permit. When surface water quality-based limits are more stringent or potentially more stringent than technology-based limitations, they must be used in a permit.

Numerical Criteria for the Protection of Human Health

The U.S. EPA has promulgated 91 numeric water quality criteria for the protection of human health that are applicable to Washington State (EPA, 1992). These criteria are designed to protect humans from cancer and other diseases and are primarily derived from fish and shellfish consumption and drinking water consumption from surface waters.

Narrative Criteria

In addition to numerical criteria, “narrative” water quality criteria (WAC 173-201A-030) limit toxic, radioactive, or deleterious material concentrations below those which have the potential to adversely affect characteristic water uses, cause acute or chronic toxicity to biota, impair aesthetic values, or adversely affect human health. Narrative criteria protect the specific beneficial uses of all fresh (WAC 173-201A-130) and marine (WAC 173-201A-140) waters in the state of Washington.

Antidegradation

The State of Washington’s Antidegradation Policy requires that discharges into a receiving water shall not further degrade the existing water quality of the water body. In cases where the natural conditions of a receiving water are of lower quality than the criteria assigned, the natural conditions shall constitute the water quality criteria. Similarly, when the natural conditions of a receiving water are of higher quality than the criteria assigned, the natural conditions shall constitute the water quality criteria. More information on the State Antidegradation Policy can be obtained by referring to WAC 173-201A-070.

Mixing Zones

The water quality standards allow the Department to authorize mixing zones around a point of discharge in establishing surface water quality-based effluent limits. Both “acute” and “chronic” mixing zones may be authorized for pollutants that can have a toxic effect on the aquatic environment near the point of discharge. The concentration of pollutants at the boundary of these mixing zones may not exceed the numerical criteria for that type of zone. Mixing zones can only be authorized for discharges that are receiving AKART and in accordance with other mixing zone requirements of WAC 173-201A-100. The National Toxics Rule (EPA, 1992) allows the chronic mixing zone to be used to meet human health criteria.

SURFACE WATER QUALITY CRITERIA

Applicable criteria are defined in Chapter 173-201A WAC for aquatic biota. In addition, U.S. EPA has promulgated human health criteria for toxic pollutants (EPA, 1992). Pollutants that might be expected in the discharge from construction activity are: turbidity, pH, and petroleum products. The water quality standards for turbidity and pH for Class AA and Class A waters are:

Turbidity: Shall not exceed 5 NTU over background turbidity when the background turbidity is 50 NTU or less, or have more than a 10 percent increase in turbidity when the background turbidity is more than 50 NTU.

pH: Shall be within the range of 6.5 to 8.5 (freshwater) or 7.0 to 8.5 (marine water) with a human-caused variation within a range of less than 0.2 units.

TPH: The federal criterion for oil and grease in the *Quality Criteria for Water, 1986*, is that surface waters shall be virtually free from floating oils of petroleum. Bioaccumulation of petroleum products presents two especially important public health problems: (1) the tainting of edible, aquatic species, and (2) the possibility of edible marine organisms incorporating the high boiling, carcinogenic polycyclic aromatics in their tissues. Oils of any kind can cause drowning of water fowl because of loss of buoyancy, exposure because of loss of insulating capacity of feathers and starvation and vulnerability to predators because of lack of mobility. In addition, lethal effects on fish by coating epithelial surfaces of gills, thus preventing respiration, asphyxiation of benthic life forms when floating masses become engaged with surface debris and settle on the bottom and adverse aesthetic effects of fouled shorelines and beaches. Oil pollutants may also be incorporated into sediments. There is evidence that once this occurs in the sediments below the aerobic surface layer, petroleum can remain unchanged and toxic for long periods, since its rate of bacterial degradation is slow. The Department determines 5 mg/L total petroleum hydrocarbon limit, no visible oil sheen, discoloration, or turbidity meets this requirement. Monitoring will be by grab sample, visual observation, and logging and noncompliance notification.

Also, the hazardous waste rules under RCW 90.56 for petroleum products have been interpreted under RCW 90.48 to prohibit visible sheen.

Mercury: Shall not exceed 2.10 µg/L, based upon WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, Water Quality Criteria, Freshwater, Acute.

Ground Water Quality Limitations: The Department has promulgated Ground Water Quality Standards (Chapter 173-200 WAC) to protect beneficial uses of ground water. Permits issued by the Department shall be conditioned in such a manner so as not to allow violations of those standards (WAC 173-200-100).

Additional effluent limitations and monitoring requirement for mercury at compressor stations and monitoring stations are based upon WAC 173-200, Water Quality Standards for Ground Waters of the State of Washington.

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are required (WAC 173-220-210 and 40 CFR 122.41) to verify that the BMPs are functioning correctly and that the water quality criteria are not being violated in the receiving water.

The monitoring schedule is detailed in the proposed permit under Condition S.2. Recent monitoring requirements require 0.25-inch rain event sampling of construction stormwater discharges.

- A. The monitoring order for the Des Moines Creek Basin Restoration Project Phase 1 project requires monitoring of 0.25-inch rain events for construction stormwater and dewatering water.

- B. The final construction stormwater permit for the King County's Brightwater Wastewater Treatment Plant construction project requires 0.25-inch rain event sampling.
- C. The final construction stormwater permit for the King County's Brightwater Conveyance System construction project requires 0.25-inch rain event sampling.
- D. The Industrial Stormwater General permit, issued in August 2002, established monitoring requirements that set a storm event trigger of "greater than 0.1 inches in a 24-hour period."
- E. The Washington State Department of Transportation has recognized the limitations of only monitoring 0.5-inch storm events and now more commonly uses 0.25 in their monitoring plans. The 0.5-inch rain event trigger that has been used over the past 4 or 5 years has proven to be inadequate to determine water quality compliance for short duration/high intensity storm events.
- F. The final permit for the Snoqualmie Ridge II, Redmond Ridge East, and Issaquah Highlands construction projects requires 0.25-inch rain event sampling.

The above-mentioned permits and Northwest Pipeline Corporation System's permit requires 0.25-inch event sampling because a continuous series of short-term rain events spanning several days have a reasonable potential to violate water quality standards for turbidity. Erosion potential and discharge of pollutants from construction sites are more closely correlated to rainfall intensity than the amount of rain in a 24-hour period. Light rain throughout a 24-hour period does not generate the pollution potential of a short duration high intensity storm event.

A storm event monitoring trigger of 0.25 inches will allow for better compliance determinations and help ensure protection of the turbidity criteria. Therefore, the Northwest Pipeline Corporation System permit establishes a monitoring trigger for all storm events greater than or equal to 0.25 inches in a 24-hour period (where a 24-hour period is 7:00 a.m. to 6:59 a.m. the next day).

The Department is experienced with finding points of compliance with the state turbidity standard. The Department has successfully established points of compliance for turbidity at Redmond Ridge UPD, Skagit Highlands, and Sound Transit. Also, five companion orders to the Stormwater Construction General Permit and the Sand and Gravel General Permit established points of compliance with the 5 NTU over background standard for turbidity.

The Department will establish the point of compliance in the receiving water through the review and approval of the Construction Stormwater/Dewatering Monitoring Plan required in Special Condition S3.A. Construction Stormwater/Dewatering Monitoring Plan. The downstream of the discharge point of compliance shall be the point of complete mix not to exceed 100 feet.

Monitoring for mercury is only required for construction at compressor stations and metering stations listed in Appendix C, Table 2. Mercury monitoring at an outfall may be discontinued if the Permittee consistently meets the effluent limits for that outfall for a period of six (6) consecutive rainfall events.

The Permittee is required to submit a Construction Stormwater/Dewatering Monitoring Plan thirty (30) days prior to the initial discharge and annually thereafter by March 1st. The purpose of the monitoring plan is to assess compliance with the water quality standards in each water body that will receive stormwater discharge during the following year.

LAB ACCREDITATION

The permit requires all monitoring data to be prepared by a laboratory registered or accredited under the provisions of Chapter 173-50 WAC, *Accreditation of Environmental Laboratories*.

OTHER PERMIT CONDITIONS

REPORTING AND RECORD KEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 173-220-210).

STORMWATER POLLUTION PREVENTION PLAN FOR CONSTRUCTION ACTIVITIES

Special Condition S6 requires a SWPPP for construction activity, including construction dewatering, to be prepared and implemented prior to the commencement of construction activity. The objectives of a SWPPP for construction activities are:

- 1) Implement BMPs to minimize erosion and sediments from rainfall runoff at construction sites, and to identify, reduce, eliminate, or prevent the pollution of stormwater;
- 2) Prevent violations of surface water quality, ground water quality, or sediment management standards;
- 3) Prevent, during the construction phase, adverse water quality impacts including impacts on beneficial uses of receiving water by controlling peak rates and volumes of stormwater at the Permittee's outfalls and downstream of outfalls;
- 4) Eliminate the discharges of unpermitted process wastewater, domestic wastewater, illicit discharges, and noncontact cooling water to stormwater drainage systems and waters of the state;
- 5) A Spill Prevention and Emergency Cleanup Plan shall be included as a section in the *SWPPP*. BMP S1.80 in Volume IV of Ecology's *Stormwater Management Manual (SWMM)* shall be used for guidance in developing this plan.

PART II—PROPOSED PERMIT LIMITATIONS FOR THE HYDROSTATIC TEST WATER DISCHARGE

This permit authorizes the discharge of hydrostatic test water to ground subject to meeting the effluent limitations set forth in Special Condition S1 of Part II in the permit. The technology-based daily maximum limit is set at 10 mg/L for total petroleum hydrocarbon compounds. The technology-based daily maximum limit for soil within the dewatering structures is set at 2000 mg/kg for diesel range petroleum hydrocarbon compounds, or heavy oils. The groundwater quality-based limit for pH is set between the ranges of 6.5 to 8.5 standard units. The discharge locations are listed on the table below, which are also depicted on drawings 1408.31-Y-0001 through 1408.31-Y-0014 in Appendix D.

This permit does not allow runoff or sheet flow to flow into rivers, streams, lakes, ponds, wetlands, or other surface bodies.

STORMWATER POLLUTION PREVENTION PLAN (SWPPP) FOR HYDROSTATIC TEST WATER DISCHARGE ACTIVITIES

Special Condition S4 of Part II of the permit requires the Permittee to develop and implement an adequate Stormwater Pollution Prevention Plan, prior to the discharge of hydrostatic test water from the 36-inch replacement pipeline project. The SWPPP is required to be prepared in accordance with the guidance provided in the *Stormwater Pollution Prevention Planning for Industrial Facilities* Publication # WQ-R-93-015, 1998, which is published by the Department of Ecology and available on the Department's website at <http://www.ecy.wa.gov/biblio/wqr93013.html>. The specific elements of the SWPPP are also listed in S4 of Part II of the permit.

OTHER REQUIREMENTS

MONITORING REQUIREMENTS

The monitoring and testing schedule is detailed in the proposed permit under Condition S2 of Part II. Monitoring, recording, and reporting are required in accordance with WAC 173-220-210 and 40 CFR 122.41, to verify that the BMPs are functioning correctly and that the water quality criteria are not being violated in the receiving water.

This section of the proposed permit also requires all monitoring data to be prepared by a laboratory registered or accredited under the provisions of Chapter 173-50 WAC, *Accreditation of Environmental Laboratories*.

REPORTING AND RECORDKEEPING

The conditions listed in Special Condition S3 of Part II of the permit are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 173-220-210).

BEST MANAGEMENT PRACTICES (BMPS)

The conditions listed in Special Condition S5 of Part II of the permit are best management practices to ensure prevention and reduction of pollutants being released and prevention of other adverse impacts to waters of Washington State.

GENERAL CONDITIONS (Applicable to Parts I and II)

General Conditions are based directly on state and federal law and regulations.

- Condition G1: This condition requires responsible officials or their designated representatives to sign submittals to the Department.
- Condition G2: This condition requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit.
- Condition G3: This condition specifies conditions for modifying, suspending, or terminating the permit.
- Condition G4: This condition requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application.
- Condition G5: This condition prohibits the Permittee from using the permit as a basis for violating any laws, statutes, or regulations.
- Condition G6: This condition relates to permit renewal and transfer.
- Condition G7: This condition relates to permit renewal and transfer.
- Condition G8: This condition prohibits the reintroduction of removed substances back into the effluent.
- Condition G9: This condition states that the Department will modify or revoke and reissue the permit to conform to more stringent toxic effluent standards or prohibitions.
- Condition G10: This condition incorporates by reference all other requirements of 40 CFR 122.41 and 122.42.
- Condition G11: This condition notifies the Permittee that additional monitoring requirements may be established by the Department.
- Condition G12: This condition requires the payment of permit fees.
- Condition G13: This condition describes the penalties for violating permit conditions.
- Condition G14: This condition states that the permit does not convey any property rights or any exclusive privilege.
- Condition G15: This condition requires compliance with all conditions of this permit.
- Condition G16: This condition requires compliance with effluent standards for toxic pollutants.
- Condition G17: This condition provides under the Clean Water Act that any person who falsifies, tampers with or knowingly renders inaccurate any monitoring device is subject to penalties and/or imprisonment.
- Condition G18: This condition requires the Permittee to give prior notice to the Department of planned changes to facility production or processes.

Condition G19: This condition establishes the requirement to provide advance notification to the Department of anticipated noncompliance.

Condition G20: This condition requires the submittal of any relevant facts determined to have been omitted in original permit application.

Condition G21: This condition establishes compliance schedule reporting.

PERMIT ISSUANCE PROCEDURES (Parts I and II)

PERMIT MODIFICATIONS

The Department may modify this permit to impose numerical limitations, if necessary, to meet water quality standards for surface waters, sediment quality standards, or water quality standards for ground waters, based on new information obtained from sources such as inspections, effluent monitoring, outfall studies, and effluent mixing studies.

The Department may also modify this permit as a result of new or amended state or federal regulations. The permit may be modified in the future if additional studies, investigations, or information warrant modification of the terms or conditions of the permit.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a stormwater discharge, including those limitations and conditions believed necessary to control toxics, protect human health, aquatic life, and the beneficial uses of waters of the state of Washington. The Department proposes that this proposed permit be issued for two (2) years, the length of the project.

REFERENCES FOR TEXT AND APPENDICES

Environmental Protection Agency (EPA)

- 1992. National Toxics Rule. Federal Register, V. 57, No. 246, Tuesday, December 22, 1992.
- 1991. Technical Support Document for Water Quality-based Toxics Control. EPA/505/2-90-001.
- 1985. Water Quality Assessment: A Screening Procedure for Toxic and Conventional Pollutants in Surface and Ground Water. EPA/600/6-85/002a.
- 1983. Water Quality Standards Handbook. USEPA Office of Water, Washington, D.C.

Washington State Department of Ecology.

- 1994. Permit Writer's Manual. Publication Number 92-109.

ACRONYMS

BMP	Best Management Practice
CERCLA	Comprehensive Environmental Response Compensation & Liability Act
CFR	Code of Federal Regulations
CWA	Clean Water Act
EPA	Environmental Protection Agency
ESC	Erosion and Sediment Control
FWPCA	Federal Water Pollution Control Act
NOI	Notice of Intent
NOT	Notice of Termination
NPDES	National Pollutant Discharge Elimination System
RCRA	Resource Conservation and Recovery Act
RCW	Revised Code of Washington
SEPA	State Environmental Policy Act
SWMM	Stormwater Management Manual for the Puget Sound Basin
SWPPP	Stormwater Pollution Prevention Plan
USC	United States Code
USEPA	United States Environmental Protection Agency
WAC	Washington Administrative Code
WQ	Water Quality

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to issue an individual construction stormwater NPDES permit to the Northwest Pipeline Corporation System for a construction project involving capacity replacement of their pipeline. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public Notice of Application (PNOA) was published on December 28, 2005, and January 4, 2006, in *The News Tribune*, *The Olympian*, *The Herald*, *The Bellingham Herald*, *The Chronicle*, *The Columbian*, *The Daily News*, *The Lewis County News*, *Skagit Valley Publishing Co.*, and *The Seattle Times* to inform the public that an application had been submitted and to invite comment on the issuance of this permit.

The Department published a Public Notice of Draft (PNOD) on December 28, 2005, and January 4, 2006, in *The News Tribune*, *The Olympian*, *The Herald*, *The Bellingham Herald*, *The Chronicle*, *The Columbian*, *The Daily News*, *The Lewis County News*, *Skagit Valley Publishing Co.*, and *The Seattle Times* to inform the public that draft permit and fact sheet were available for review. Interested persons were invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents were available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments were mailed to:

Water Quality Permit Coordinator
Department of Ecology
Northwest Regional Office
3190 160th Avenue SE
Bellevue, WA 98008-5452

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30)-day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, (425) 649-7028, or by writing to the address listed above.

This permit and fact sheet was developed by Monika Kannadaguli and Jeanne Tran, NWRO, Department of Ecology.

APPENDIX B—GLOSSARY

AKART--An acronym for “all known, available, and reasonable methods of treatment.”

Ambient Water Quality--The existing environmental condition of the water in a receiving water body.

Average Monthly Discharge Limitation--The average of the measured values obtained over a calendar month’s time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural, and/or managerial practices to prevent or reduce the pollution of waters of the state. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

Clean Water Act (CWA)--The Federal Water Pollution Control Act enacted by Public Law 92-500, as amended by Public Laws 95-217, 95-576, 96-483, 97-117; USC 1251 et seq.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample--A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be “time-composite” (collected at constant time intervals) or “flow-proportional” (collected either as a constant sample volume at time intervals proportional to stream flow or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.)

Construction Activity--Clearing, grading, excavation, and any other activity which disturbs the surface of the land. Such activities may include road building; construction of residential houses, office buildings, or industrial buildings; and demolition activity.

Continuous Monitoring--Uninterrupted, unless otherwise noted in the permit.

Engineering Report--A document which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Fact Sheet--A document prepared and issued with every permit which summarizes the activities and decisions on the permit and tells how the public may comment.

Grab Sample--A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Major Facility--A facility discharging to surface water with an EPA rating score of >80 points based on such factors as flow volume, toxic pollutant potential, and public health impact.

Maximum Daily Discharge Limitation--The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99 percent confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Minor Facility--A facility discharging to surface water with an EPA rating score of <80 points based on such factors as flow volume, toxic pollutant potential, and public health impact.

Mixing Zone--An area that surrounds an effluent discharge within which water quality criteria may be exceeded. The area of the authorized mixing zone is specified in a facility's permit and follows procedures outlined in state regulations (Chapter 173-201A WAC).

National Pollutant Discharge Elimination System (NPDES)--The NPDES (Section 402 of the Clean Water Act) is the federal wastewater permitting system for discharges to navigable waters of the United States. Many states, including the state of Washington, have been delegated the authority to issue these permits. NPDES permits issued by Washington State permit writers are joint NPDES/state permits issued under both state and federal laws.

Permit--Permit means a document issued pursuant to RCW 90.48.150 et seq or RCW 90.48.260 or both, specifying the waste treatment and control requirements and waste discharge conditions.

pH--The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral and large variations above or below this value are considered harmful to most aquatic life.

Quantitation Level (QL)--A calculated value five times the MDL (method detection level).

Responsible Corporate Officer--A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures (40 CFR 122.22).

State Waters--Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater--That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body or a constructed infiltration facility.

Technology-based Effluent Limit--A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Upset--An exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the Permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, lack of preventative maintenance, or careless or improper operation.

Water Quality-based Effluent Limit--A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C—TABLES 1, 2, 3, AND 4

Table 1. Discharge Locations and Receiving Water Bodies

Outfall	Potential Receiving Water	Waterbody ID	Latitude/Longitude	WADOE Class
Sumas Loop				
1	Wetland Ditch	S-1.1A	49.00002, -122.22132	A
2	Wetland Ditch	S-1.1B	48.99396, -122.22141	A
3	Wetland Ditch	S-2	48.99409, -122.22552	A
4	Wetland Ditch	S-2	48.99989, -122.22562	A
5	Wetland Ditch	S-2	48.99291, -122.22637	A
6	Wetland Ditch	S-2	48.99277, -122.22646	A
7	Upland Ditch	S-3A	48.98907, -122.22949	A
8	Upland Ditch	S-3B	48.98907, -122.22949	A
9	Upland Ditch	S-3C	48.98550, -122.23246	A
10	Saar Creek	S-4A	48.98308, -122.23448	A
11	Upland Ditch	S-5A	48.98201, -122.23514	A
12	Upland Ditch	S-5B	48.98201, -122.23514	A
13	Saar Creek	S-4B	48.98201, -122.23514	A
14	Trib. to Lake	S-7	48.96210, -122.25115	AA
15	Trib. to Lake	S-9	48.95778, -122.25551	AA
16	Wetland Ditch	S-10	48.95667, -122.25662	A
17	Trib. to Kinney Creek	S-14	48.95667, -122.25662	A
18	Trib. to Kinney Creek	S-16	48.94416, -122.26116	A
19	Kinney Creek	S-21	48.93202, -122.27091	A
20	Breckenridge Creek	S-22	48.92977, -122.27333	A
21	Upland Ditch	S-22.1A	48.92026, -122.27686	A
22	Upland Ditch	S-22.1B	48.92026, -122.27686	A
23	Swift Creek ⁵	S-23	48.91217, -122.27700	A
24	Wetland Ditch	S-25	48.90561, 122.28048	A
25	Wetland Ditch	S-26.1A	48.90404, -122.28208	A
26	Wetland Ditch	S-26.1B	48.90319, -122.28295	A
27	Trib. to Sumas River	S-27	48.90184, -122.28349	A
28	Pond Outlet	S-27	48.90184, -122.28349	A
29	Trib. to Sumas River	S-29	48.89648, -122.28345	A
30	Upland Ditch	S-29.1	48.89445, -122.28343	A
31	Upland Ditch	S-29.2	48.89401, -122.28343	A
32	Trib. to Sumas River	S-30	48.89256, -122.28342	A
33	Trib. to Sumas River	S-31A, B	48.89170, -122.28341	A
34	Dale Creek	S-32	48.88865, -122.28339	A
35	Trib. to Sumas River	S-35	48.88865, -122.28339	A
36	Trib. to Sumas River	S-38	48.88865, -122.28339	A
37	Unnamed Tributary	S-39	48.89256, -122.28342	A
38	Unnamed Tributary	S-43	48.87044, -122.27825	A
39	Unnamed Tributary	S-44	48.86825, -122.27765	A
40	Trib. to Smith Creek	S-48	48.85204, -122.27585	A
41	Trib. to Sumas River	S-47	48.85750, -122.27911	A
42	Upland Ditch	S-49.1	48.85001, -122.27405	A
43	Upland Ditch	S-51	48.84522, -122.26800	A
44	Unnamed Tributary	S-52	48.84484, -122.26707	A
45	Wetland Ditch	S-53	48.84431, -122.266577	A
46	Upland Ditch	S-53.1	48.84355, -122.26392	A

Outfall	Potential Receiving Water	Waterbody ID	Latitude/Longitude	WADOE Class
47	Smith Creek	S-54	48.84188, -122.25935	A
48	Trib. to Macaulay Creek	S-55	48.84028, -122.25396	A
49	Trib. to Macaulay Creek	S-56	48.83797, -122.24616	A
50	Upland Ditch	S-56.1	48.83755, -122.24476	A
51	Macaulay Creek	S-57	48.83445, -122.23613	A
52	Trib. to Mitchell Creek	S-57.1	48.83288, -122.23271	A
53	Mitchell Creek-ditch	S-59	48.83214, -122.23109	A
54	Trib. to Mitchell Creek	S-60	48.82808, -122.21905	A
55	Trib. to Mitchell Creek	S-62	48.82570, -122.21276	A
56	Ditch & Unnamed Trib.	S-64	48.82178, -122.20104 48.82153, -122.20082	A
57	Trib. to Jim Creek	S-66	48.81842, -122.19641	A
58	Trib. to Jim Creek	S-67A	48.81813, -122.19593	A
59	Trib. to Jim Creek	S-67B	48.81764, -122.19557	A
60	Jim Creek	S-68	48.81643, -122.19506	A
61	Trib. to Nooksack River	S-69	48.81308, -122.19338	A
62	N. Fork Nooksack River	S-70	48.80975, -122.19194	A
63	Tributary to S. Fork Nooksack River	S-73	48.79863, -122.18822	A
64	Tributary to S. Fork Nooksack River	S-74	48.79667, -122.18748	A
65	Tributary to S. Fork Nooksack River	S-74	48.79569, -122.18712	A
66	Tributary to S. Fork Nooksack River	S-75	48.79274, -122.18635	A
67	Tributary to S. Fork Nooksack River	S-76	48.79018, -122.18598	A
68	Tributary to S. Fork Nooksack River	S-76	48.79024, -122.18585	A
69	Trib. to Black Slough	S-78	48.77535, -122.18864	A
70	Wetland Ditch	S-80A	48.77083, -122.18944	A
71	Wetland Ditch	S-80B	48.77083, -122.18944	A
72	Trib. to Black Slough	S-82	48.76435, -122.18898	A
73	Wetland Ditch	S-82	48.76444, -122.18914	A
74	Wetland Ditch	S-82	48.76315, -122.18915	A
75	Wetland Ditch	S-82	48.76027, -122.18916	A
76	Wetland Ditch	S-83	48.76012, -122.18918	A
77	Tinling Creek	S-84	48.75839, -122.18947	A
78	Wetland Ditch	S-85	48.75695, -122.18971	A
79	Wetland Ditch	S-85	48.75319, -122.19034	A
80	Wetland Ditch	S-86A	48.74613, -122.19047	A
81	Wetland Ditch	S-86B	48.74598, -122.19047	A
82	Wetland Ditch	S-87	48.74252, -122.19053	A
83	Trib. to Black Slough	S-88	48.73906, -122.19059	A
84	Wetland Ditch	S-89A	48.73545, -122.19065	A
85	Wetland Ditch	S-89B	48.73531, -122.19066	A
86	Tributary to S. Fork Nooksack River	S-91	48.71937, -122.19191	A
Mt. Vernon Loop				
87	Pilchuck Creek	MV-7	48.26608, -122.16326	A
88	Trib. to Pilchuck Creek (Ditch)	MV-8	48.26582, -122.16308	A
89	Trib. to Pilchuck Creek	MV-8.1	48.26455, -122.16159	A
90	Armstrong Creek	MV-11	48.22857, -122.13190	A
91	North Fork Stillaguamish River	MV-14	48.21185, -122.11670	A
92	South Fork Stillaguamish River	MV-15	48.20803, -122.11389	A
93	Eagle Creek	MV-16	48.20274, -122.10907	A
94	Wetland Ditch	MV-17	48.19596, -122.10525	A
95	Wetland Ditch	MV-18	48.19400, -122.10476	A

Outfall	Potential Receiving Water	Waterbody ID	Latitude/Longitude	WADOE Class
96	Tributary to S. Fork Stillaguamish River	MV-20	48.18470, -122.10110	A
97	Tributary to S. Fork Stillaguamish River	MV-23	48.18029, -122.10024	A
98	Wetland Ditch	MV-24	48.17901, -122.09995	A
99	Tributary to S. Fork Stillaguamish River	MV-27	48.17168, -122.09802	A
100	Olson Lake	MV-32A&B	48.14484, -122.08367	AA
101	Tributary to Star Creek (ditch)	MV-44	48.09884, -122.06584	A
102	Upland Ditch	MV-45	48.09748, -122.06542	A
103	Upland Ditch	MV-47A	48.09309, -122.06220	A
104	Upland Ditch	MV-47B	48.09295, -122.06219	A
105	Star Creek	MV-49.1	48.09001, -122.06214	A
106	Tributary to Little Pilchuck Creek	MV-50	48.07294, -122.06055	A
107	Upland Ditch	MV-50.1	48.07221, -122.06042	A
108	Upland Ditch	MV-51	48.07075, -122.06025	A
109	Upland Ditch	MV-53A	48.06594, -122.05995	A
110	Upland Ditch	MV-53B	48.06579, -122.05993	A
111	Upland Ditch	MV-54	48.05769, -122.05850	A
112	Tributary to Little Pilchuck Creek	MV-55	48.04358, -122.05603	A
113	Tributary to Little Pilchuck Creek	MV-57	48.04105, -122.05555	A
114	Upland Ditch	MV-59	48.03863, -122.05517	A
115	Upland Ditch	MV-59.1	48.03589, -122.05488	A
116	Little Pilchuck Creek	MV-62	48.02935, -122.05249	A
117	Little Pilchuck Creek	MV-63	48.02179, -122.05033	A
118	Upland Ditch	MV-64	48.01908, -122.04991	A
119	Catherine Creek	MV-66	48.00914, -122.05163	A
Snohomish Loop				
120	Tributary to Paradise Lake/Bear Creek	SN-2	47.78549, -122.05738	A
121	Upland Ditch	SN-2.1	47.78478, -122.05735	A
122	Upland Ditch	SN-3.2A	47.78122, -122.05721	A
123	Upland Ditch	SN-3.2B	47.78122, -122.05721	A
124	Tributary to Paradise Lake/Bear Creek	SN-4	47.77879, -122.05767	AA
125	Tributary to Paradise Lake/Bear Creek	SN-6	47.77591, -122.05712	AA
126	Tributary to Paradise Lake/Bear Creek	SN-6	47.77535, -122.05691	AA
127	Tributary to Paradise Lake/Bear Creek	SN-7	47.78122, -122.05721	AA
128	Tributary to Paradise Lake/Bear Creek	SN-21	47.78122, -122.05721	AA
129	Struve Creek	SN-22	47.77879, -122.05767	A
130	Colin Creek	SN-24	47.77591, -122.05712	A
131	Trib. to Seidel Creek	SN-28 A,B	47.77535, -122.05691	A
132	Trib. to Seidel Creek	SN-29	47.78122, -122.05721	A
133	Trib. to Bear Creek	SN-32	47.78122, -122.05721	A
134	Trib. to Evans Creek	SN-37	47.77879, -122.05767	A
135	Trib. to Evans Creek	SN-38	47.77591, -122.05712	A
136	Trib. to Evans Creek	SN-39.3	47.77591, -122.05712	A
137	Upland Ditch	SN-40.2	47.78122, -122.05721	A
138	Evans Creek	SN-42	47.78122, -122.05721	A
139	Trib. to Evans Creek	SN-43	47.77879, -122.05767	A
Ft. Lewis Loop				
140	Lacamas Creek	FL-17	47.77591, -122.05712	A
141	Murray Creek	FL-23	47.77591, -122.05712	A
142	Nisqually River	FL-35A,B	47.77591, -122.05712	A
143	Centralia Canal	FL-37	47.77591, -122.05712	A

Outfall	Potential Receiving Water	Waterbody ID	Latitude/Longitude	WADOE Class
144	Tributary to Yelm Creek (ditch)	FL-43	47.77591, -122.05712	A
145	Upland Ditch	FL-44.1A	47.77591, -122.05712	A
146	Upland Ditch	FL-44.1B	47.77591, -122.05712	A
147	Tributary to Yelm Creek	FL-45	47.77591, -122.05712	A
148	Upland Ditch	FL-45.1B	47.77591, -122.05712	A
149	Upland Ditch	FL-46	47.77591, -122.05712	A
150	Upland Ditch	FL-46.1	47.77591, -122.05712	A
151	Upland Ditch	FL-47.1A	47.77591, -122.05712	A
152	Upland Ditch	FL-47.1B	47.77591, -122.05712	A
26-Inch Disconnect				
153	Trib. to East Fork Lewis River (Ditch)	RF-1	46.85321, -122.67695	A

Table 2. Compressor and Meter Stations List

Compressor or Meter Station Name	Facility Type	Milepost	County	Address	City, Zip
A & M Rendering Co. Meter Station	M/S	5.00	Whatcom		
Acme Meter Station	M/S	1461.24	Whatcom		
Anacortes (Mt. Vernon) Meter Station	M/S	1440.61	Skagit	SR 242	
Arlington Delivery Meter Station	M/S	1422.57	Snohomish		
Bartelheimer Dairy Meter Station	M/S	1400.16	Snohomish		
Bellingham I (Ferndale) Meter Station	M/S	8.32	Whatcom	Britton Rd & Mt Baker Hwy	Bellingham, 98226
Bellingham II Test	M/S		Whatcom		
Bellingham No. 2 Delivery Meter Station	M/S	1481.55	Whatcom	Minakee Rd	Sumas, 98295
Black Diamond Meter Station	M/S	1360.16	King		
Buckley Meter Station	M/S	1355.88	King		
Cameron Village/East Auburn Meter Station	M/S	1356.11	King		
Covington By-Pass Meter Station	M/S	1362.84	King		
Covington Meter Station	M/S	1362.84	King	19241 SE 272nd St	Covington, 98042
Deming Delivery Meter Station	M/S	1469.95	Whatcom		
Duvall Cottage Lake (Retired)	M/S	1391.39	King		
Duvall Cottage Lake Meter Station (New)	M/S	1391.39	King		
Echo Lake Meter Station	M/S	1394.00	Snohomish		
Enumclaw Buckley Meter Station	M/S	1355.96	King	3839 Academy Dr SE	Auburn, 98002-7334
Enumclaw Net Meter Station	M/S		King		
Everett Delta Meter Station	M/S		Snohomish		
Granite Falls Delivery Meter Station	M/S	1414.08	Snohomish	Getchell Rd	
Issaquah Highlands Meter Station	M/S	1.42	King	22339 SE 56th St	Issaquah, 98027
Lake Francis Meter Station	M/S	1368.58	King		
Lake Stevens Delivery Meter Station	M/S	1409.84	Snohomish	Robinett @ N. Machias Rd	Lake Stevens
Lawrence Delivery Meter Station	M/S	1473.49	Whatcom		
LDS Church Meter Station	M/S	1423.98	Snohomish	Arlington Heights Rd	Arlington
Lynden Delivery Meter Station	M/S	1478.57	Whatcom	Lebrant Rd	Lynden, 98264
Machias Meter Station	M/S	1407.96	Snohomish	12th at 135th	Machias
Maple Heights Meter Station	M/S	2.67	King		
May Valley Meter Station	M/S	1372.75	King		
Monroe Meter Station	M/S	2.94	Snohomish		
Mount Vernon C/S	C/S	1440.18	Skagit	15498 Lange Rd	Mount Vernon, 98273
North Bend Meter Station	M/S	1379.25	King	24403 SE 32nd St	Issaquah, 98027
North Seattle Meter Station	M/S	0.61	Snohomish	12426 Elliot Rd	Snohomish, 98290
Novelty Hill Delivery Meter Station	M/S	1387.22	King	Novelty Hill Rd	Redmond
Oak Harbor - Stanwood Meter Station	M/S	11.36	Snohomish	Camino Island Bridge	Stanwood, 98292
Redmond Delivery Meter Station	M/S	1385.37	King	22607 NE Union Hill Rd	Redmond, 98053-7961
Sedro-Woolley Meter Station	M/S	1447.66	Skagit	Fruitdale Rd	Sedro Wooley, 98284
SIPI Delivery (export) Meter Station	M/S	1484.47	Whatcom		
SIPI Reciept (inport) Meter Station	M/S	1484.47	Whatcom		
Snohomish C/S	C/S	1393.94	Snohomish	22906 Echo Lake Rd	Snohomish, 98290-7860
Snohomish Meter Station	M/S	1402.46	Snohomish	13931 SR 2	Monroe, 98272
South Seattle Meter Station	M/S	8.57	King	800 S 21st St	Renton, 98055
Sumas	C/S	1484.60	Whatcom	4738 Jones Rd	Sumas, 98295
SUS C/S	C/S	1484.60	Whatcom		

Total: 45

M/S - Meter Station

C/S - Compressor Station

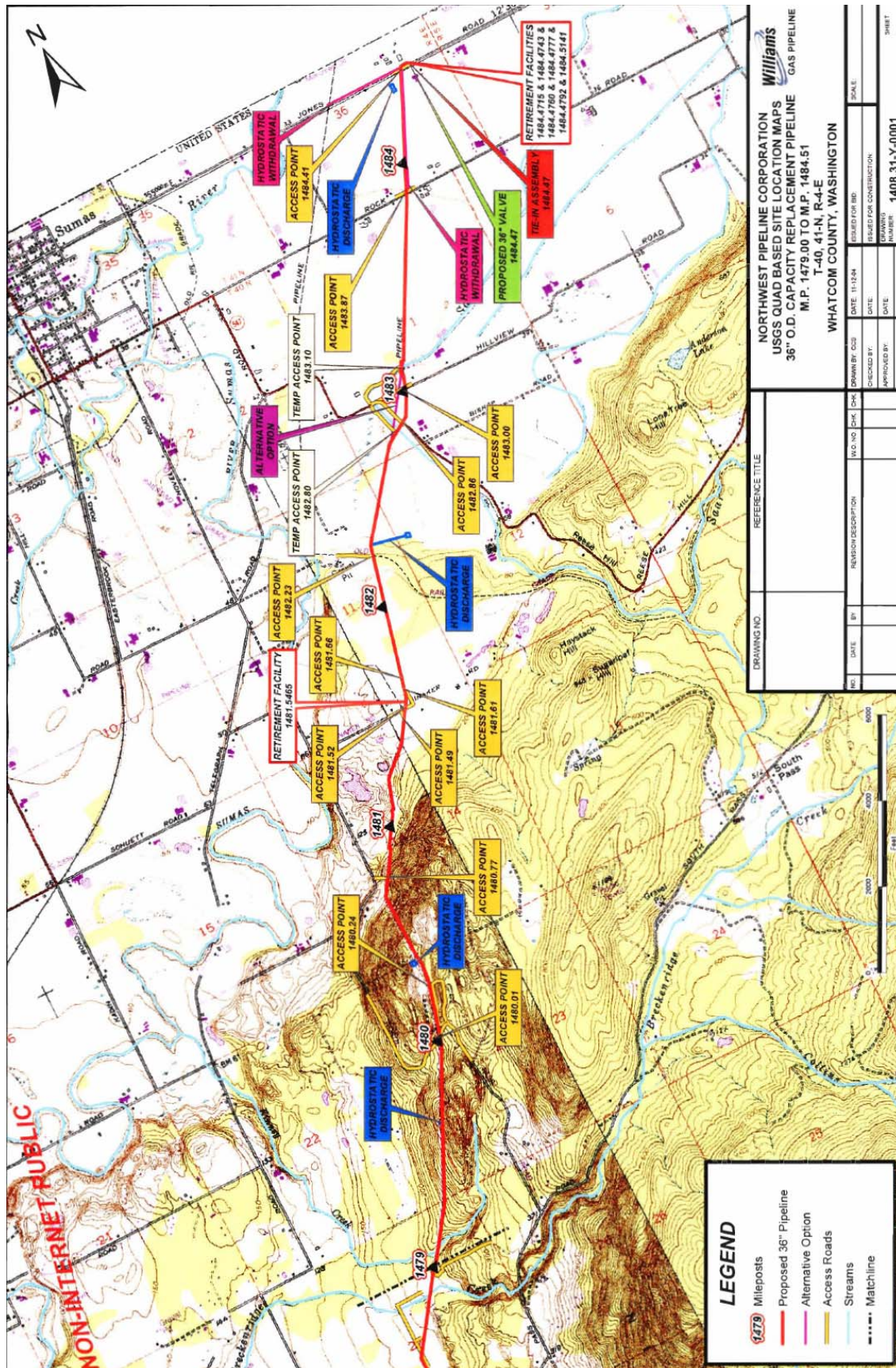
Table 3. Temporary Extra Work Spaces Associated With the Abandonment Activities in Locations Outside of the Proposed Loops for the Capacity Replacement Project.

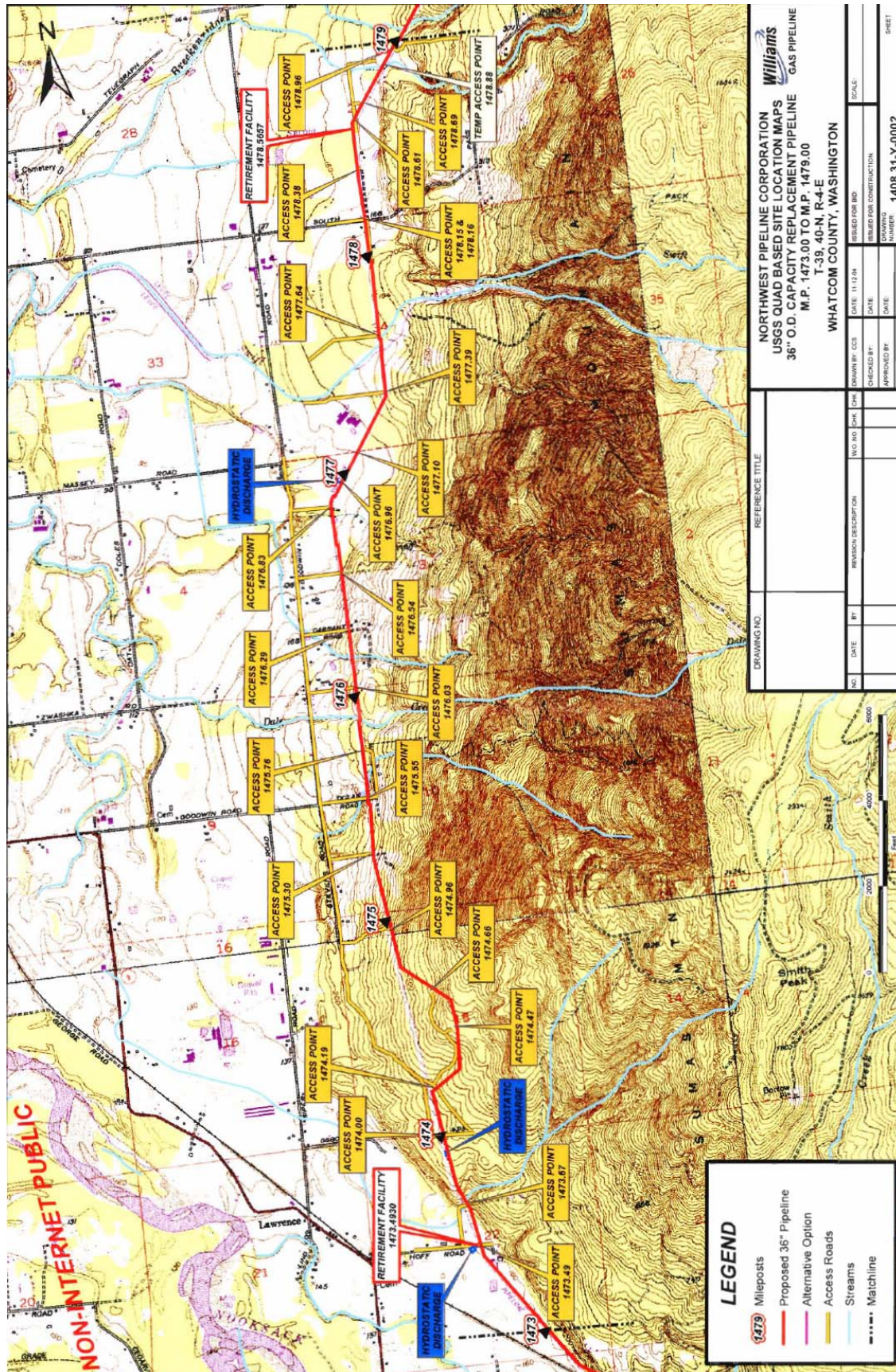
Temporary Extra Workspace ID	Milepost	Dimensions (feet)	Acres of Impact (Construction)	Purpose
D-TEWS-53	1217.45	Irregular	0.3	Camas Delivery Meter Station
D-TEWS-12	1225.39	Irregular	0.4	North Vancouver Meter Station
D-TEWS-13	1229.10	Irregular	0.2	Battleground Meter Station
D-TEWS-14	1231.13	100 x 75	0.2	Battleground District Office Meter Tap
D-TEWS-15	1232.52	Irregular	0.6	Portland Lateral Take-off
D-TEWS-16	1237.72	100 x 75	0.2	Ridgefield Meter Station
D-TEWS-17	1239.41	200 x 75	0.4	26-inch Crossover, Valve 16-1X
D-TEWS-18	1239.98	Irregular	0.2	Van Der Salm Bulb Farm Meter Station
D-TEWS-19	1243.70	Irregular	0.2	Woodland Meter Station
D-TEWS-20	1249.30	200 x 75	0.4	Astoria Line Take-off
D-TEWS-21	1251.39	Irregular	0.2	Kalama Farm Tap
D-TEWS-22	1258.44	200 x 75	0.3	Longview South Meter Station
D-TEWS-23	1262.95	105 x 75	0.2	Kelso (Longview) Meter Station
D-TEWS-24	1265.54	Irregular	0.3	Weyerhaeuser/Ostrander Meter Station
D-TEWS-25	1266.61	200 x 75	0.4	Kelso-Beaver Meter Station
D-TEWS-26	1270.91	Irregular	0.2	Castle Rock Meter Station
D-TEWS-27	1283.97	123 x 75	0.2	Toledo Meter Station
D-TEWS-28	1286.75	Irregular	0.2	Winlock Meter Station
D-TEWS-29	1289.28	200 x 75	0.3	Jackson Prairie Storage Facility
D-TEWS-30	1294.51	Irregular	0.2	Mac Millan Rest Home Tap
D-TEWS-31	1297.15	200 x 75	0.4	Berwick Lateral Tie-in
D-TEWS-32	1298.18	Irregular	0.2	Chehalis Meter Station
D-TEWS-33	1305.30	200 x 75	0.4	Centralia Line Take-off
D-TEWS-34	1309.94	200 x 75	0.4 26-inch	Crossover, Valve 16-6XS
D-TEWS-35	1338.39	Irregular	0.3	Scott Delivery Meter Station
D-TEWS-36	1338.89	200 x 75	0.4	Boeing and Fredrickson

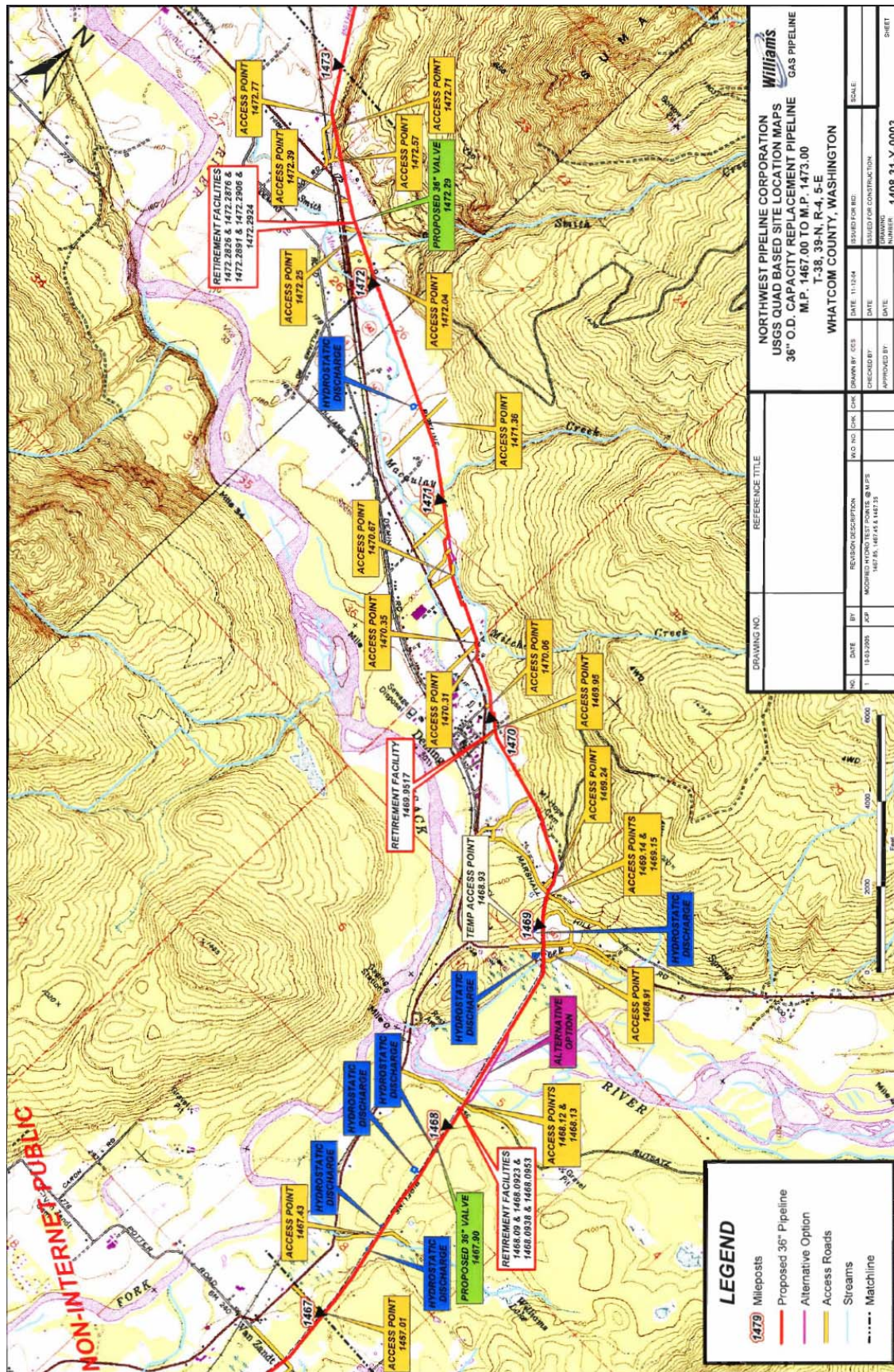
					Delivery Meter
	D-TEWS-37	1339.25	100 x 75	0.2	South Tacoma Delivery Site
	D-TEWS-38	1343.29	Irregular	0.3	Puyallup (Rainier Terrace) Meter Station
	D-TEWS-39	1347.23	152 x 75	0.3	Puyallup North Meter Station
	D-TEWS-39.1	1351.64	Irregular	0.4	Sumner Compressor Station
	D-TEWS-40	1352.08	200 x 75	0.4	North Tacoma Take-off
	D-TEWS-41	1355.96	Irregular	0.2	Enumclaw Buckley Meter Station
	D-TEWS-42	1356.11	100 x 75	0.2	Cameron Village East Auburn Tap
	D-TEWS-43	1360.16	Irregular	0.4	Black Diamond Meter Station
	D-TEWS-44	1362.84	223 x 75	0.4	Covington Meter Station
	D-TEWS-8	1368.57	Irregular	0.3	Lake Francis Meter Station
	D-TEWS-45	1370.10	247 x 75	0.4	South Seattle Take-off
	D-TEWS-46	1372.75	100 x 75	0.2	May Valley Meter Station
	D-TEWS-46.1	1379.25	Irregular	0.4	North Bend Meter Station
	D-TEWS-9	1397.09	240 x 75	0.3	North Seattle Take-off
	D-TEWS-47	1400.16	Irregular	0.2	Bartelheimer Dairy Meter Station
	D-TEWS-10	1401.04	250 x 75	0.4	Grotto Line Take-off
	D-TEWS-48	1402.46	Irregular	0.2	Snohomish Meter Station
	D-TEWS-49	1407.96	100 x 75	0.2	Machias Meter Station
	D-TEWS-50	1440.61	100 x 75	0.2	Anacortes Meter Station
	D-TEWS-11	1447.66	231 x 75	0.4	Sedro-Woolley Meter Station
	D-TEWS-51	1450.68	200 x 75	0.4	Fruitdale Block Valve
	D-TEWS-52	1461.24	Irregular	0.3	Acme Meter Station

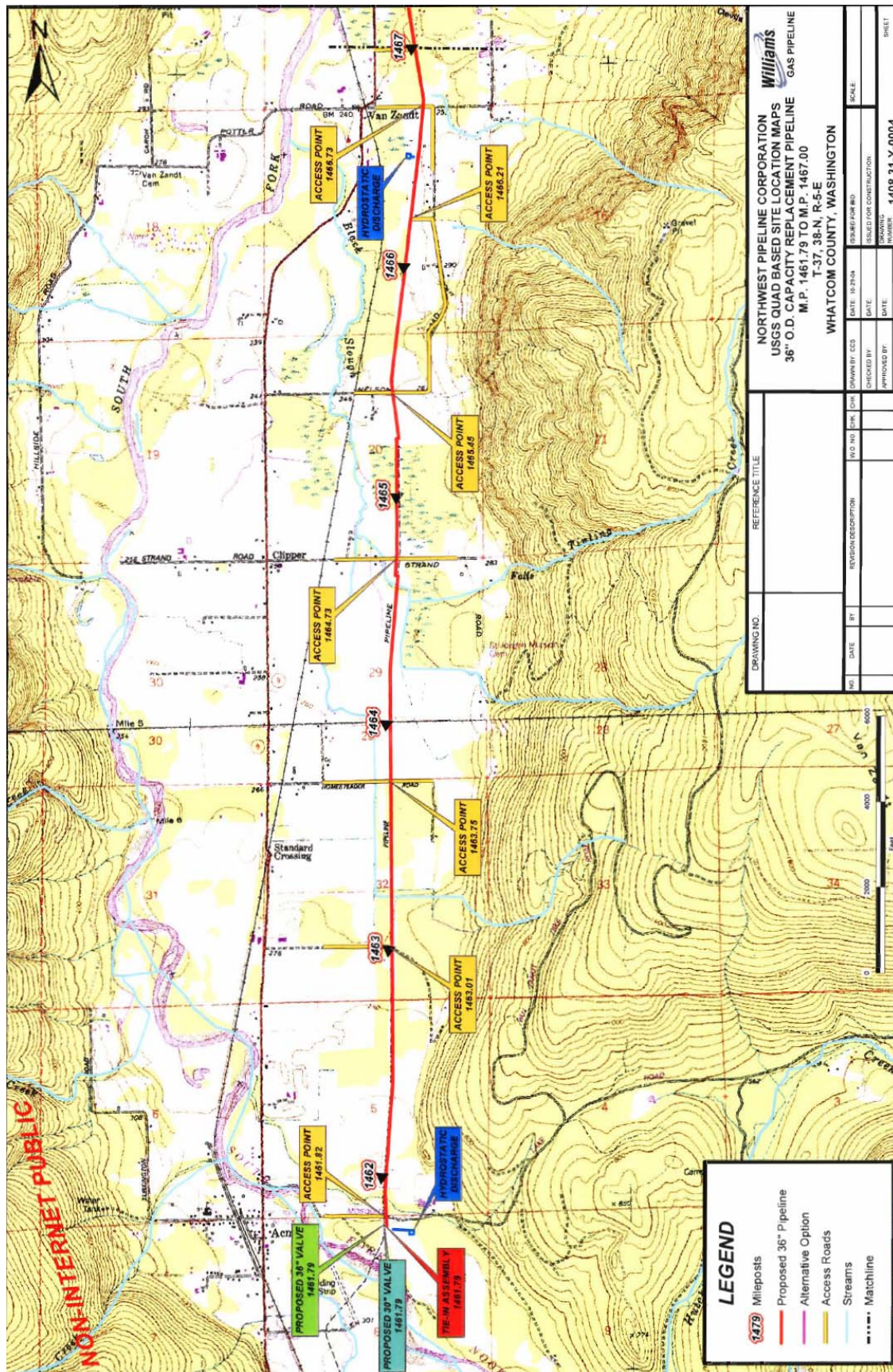
Table 4. Hydrostatic Test Water Discharge Locations for the Capacity Replacement Project
(as depicted on Figure 2-15)

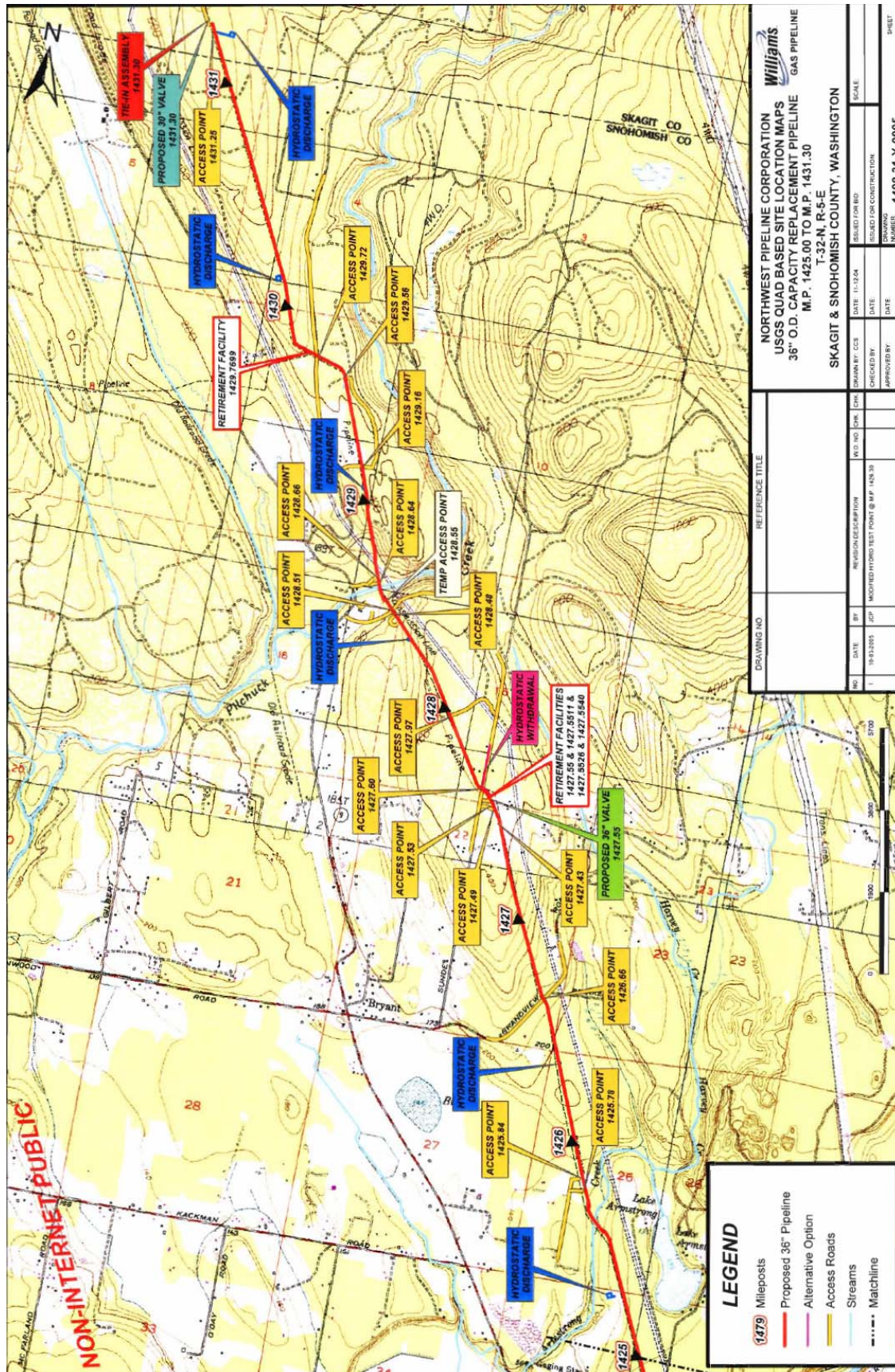
Discharge Location #2	Mile Post	Environmental Alignment Sheet	Application Area (acres)
Sumas Loop			
HYDRO-1	1484.34	S-1(266E)	w/i ROW
HYDRO-2	1482.28	S-3(266C)	0.41
HYDRO-3	1480.36	S-5(266A)	0.23
HYDRO-4	1479.63	S-6(265F)	w/i ROW
HYDRO-5	1476.95	S-8(265D)	0.25
HYDRO-6	1473.91	S-11(265A)	w/i ROW
HYDRO-7	1473.48	S-12(264E)	0.25
HYDRO-8	1471.43	S-14(264C)	0.24
HYDRO-9	1469.00	S-16(264A)	0.27
HYDRO-10	1468.87	S-16(264A)	0.24
HYDRO-10A	1467.85	S-17(263F)	w/i ROW
HYDRO-11	1467.75	S-17(263F)	0.24
HYDRO-11A	1467.45	S-17(263F)	w/i ROW
HYDRO-11B	1467.35	S-18(263E)	w/i ROW
HYDRO-12	1466.50	S-18(263E)	0.25
HYDRO-13	1461.77	S-22(263A)	0.32
Mt. Vernon Loop			
HYDRO-14	1431.25	MV-1(257D)	0.31
HYDRO-15	1430.13	MV-2(257C)	0.23
HYDRO-16	1429.05	MV-3(257B)	w/i ROW
HYDRO-17	1428.35	MV-3(257B)	w/i ROW
HYDRO-17A	1426.30	MV-5(256D)	w/i ROW
HYDRO-18	1425.29	MV-6(256C)	0.25
HYDRO-19	1424.67	MV-6(256C)	0.06
HYDRO-20	1424.53	MV-6(256C)	0.06
HYDRO-21	1423.21	MV-8(256A)	0.06
HYDRO-22	1422.65	MV-8(256A)	0.23
HYDRO-23	1421.61	MV-9(255E)	0.06
HYDRO-24	1417.42	MV-13(255A)	0.23
HYDRO-25	1414.71	MV-15(254D)	0.23
HYDRO-26	1412.77	MV-17(254B)	0.24
HYDRO-27	1408.83	MV-20(253E)	0.23
Snohomish Loop			
HYDRO-28	1393.89	SN-1(251A)	0.23
HYDRO-29	1383.86	SN-10(249B)	0.23
Ft. Lewis Loop			
HYDRO-30	1323.91	FL-14(238C)	0.55

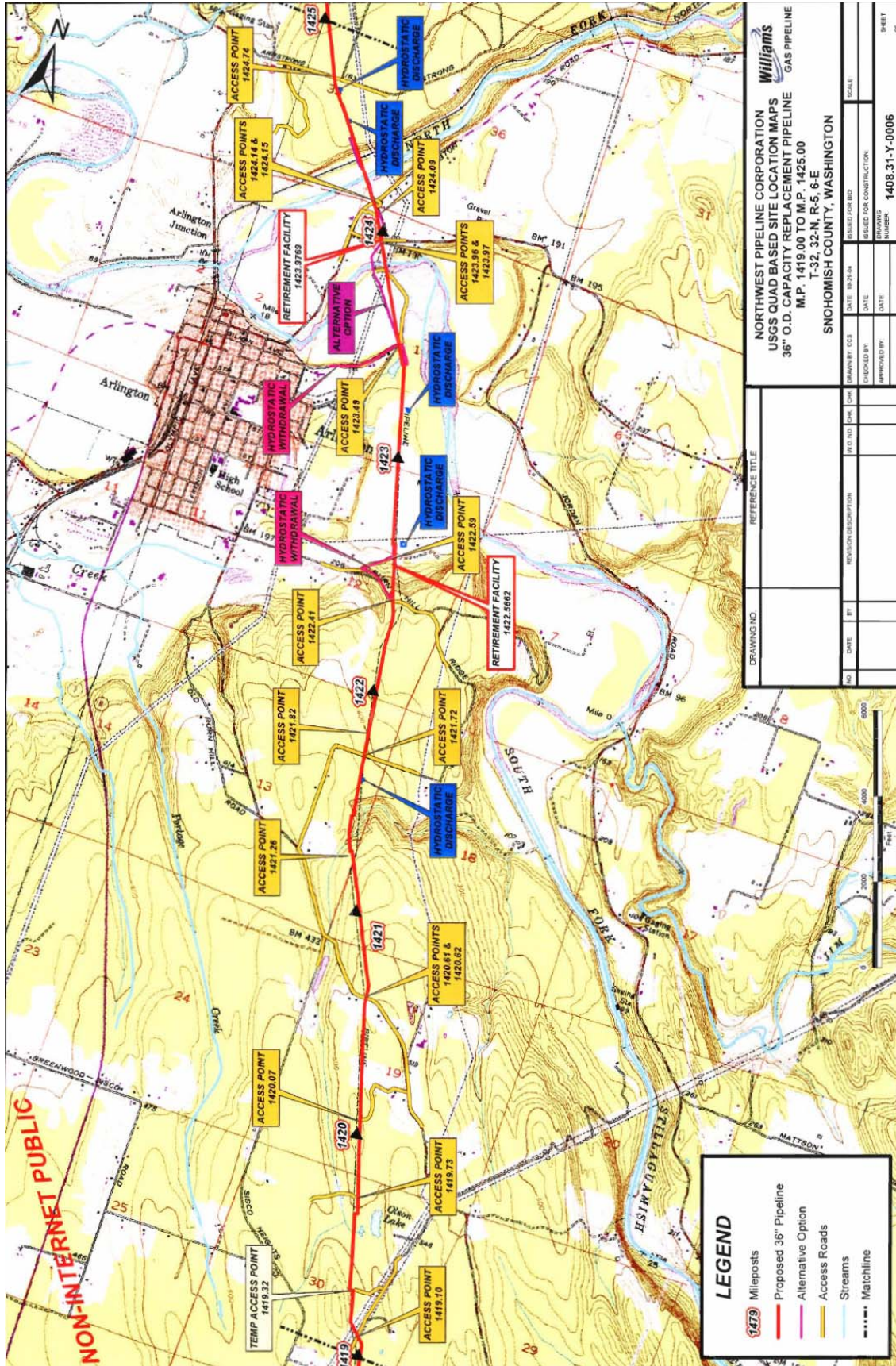


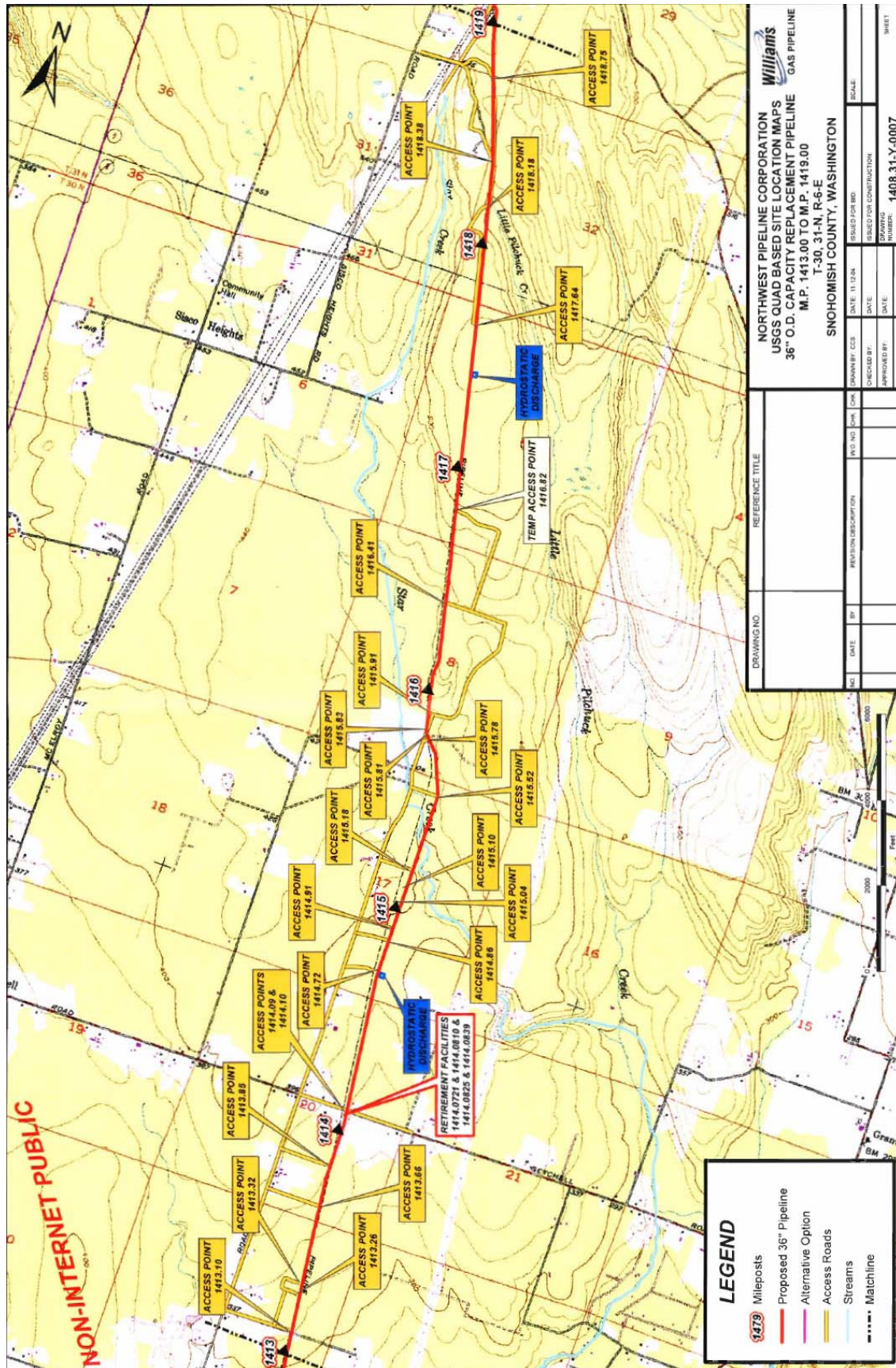


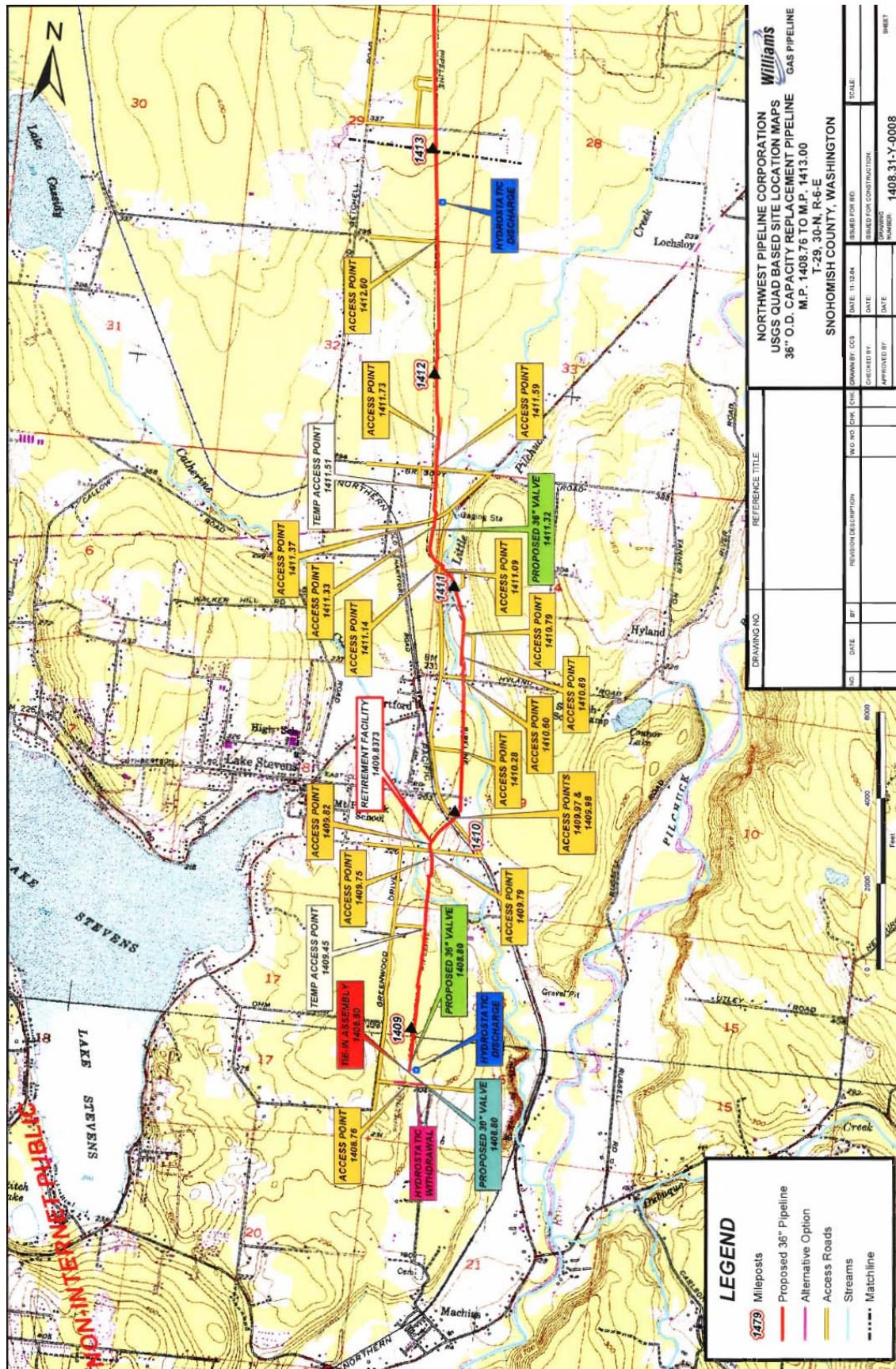


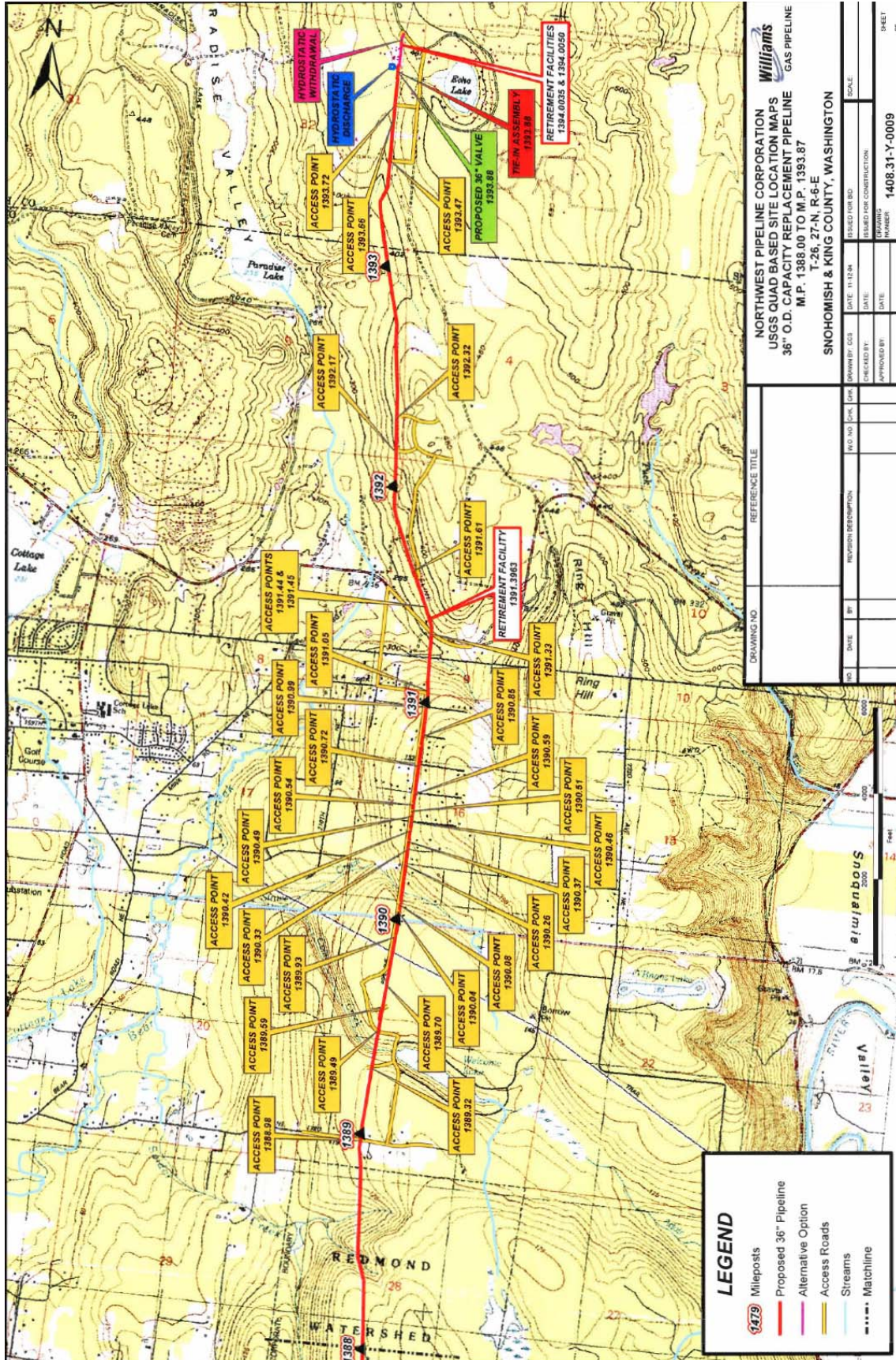


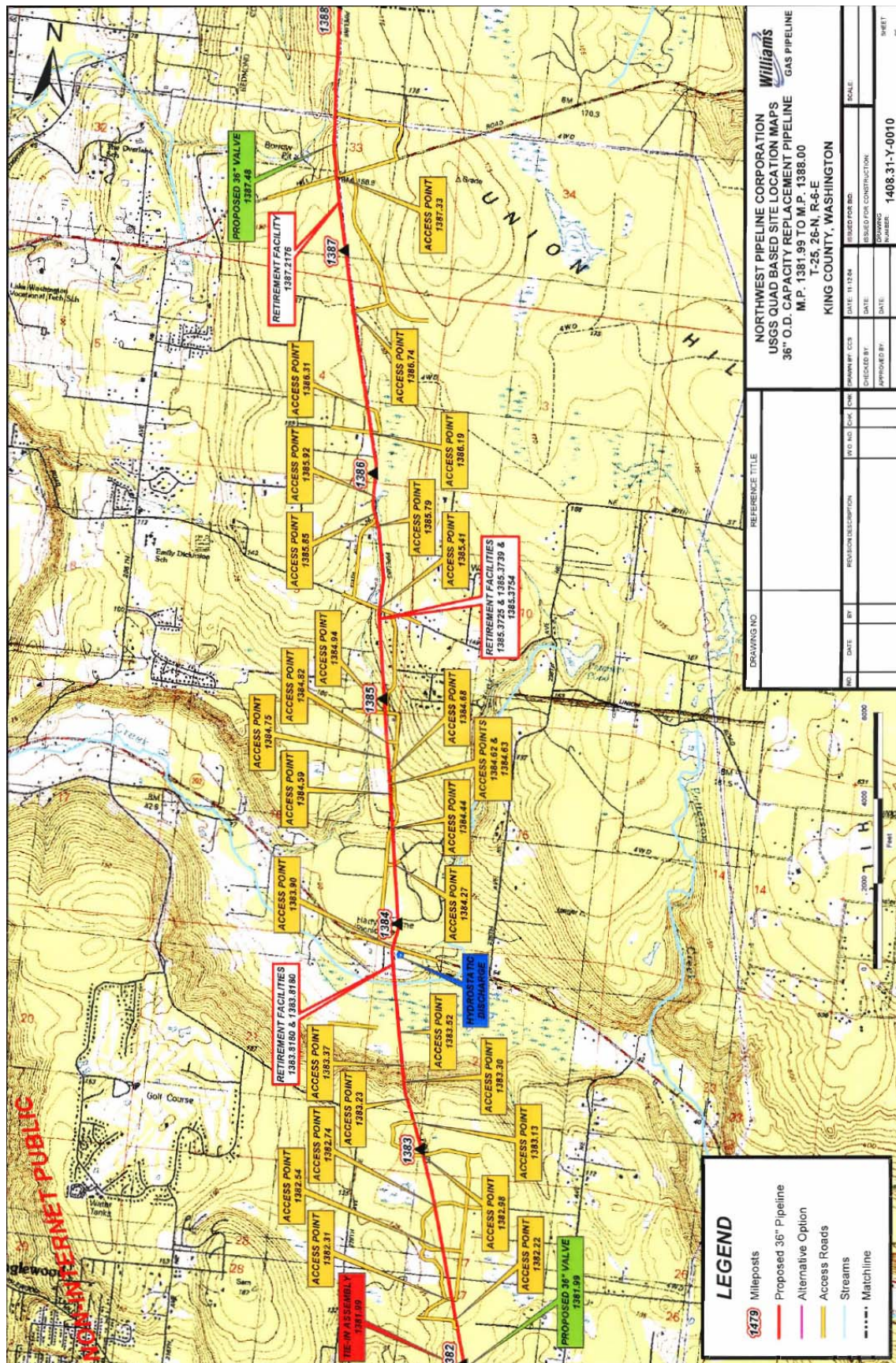


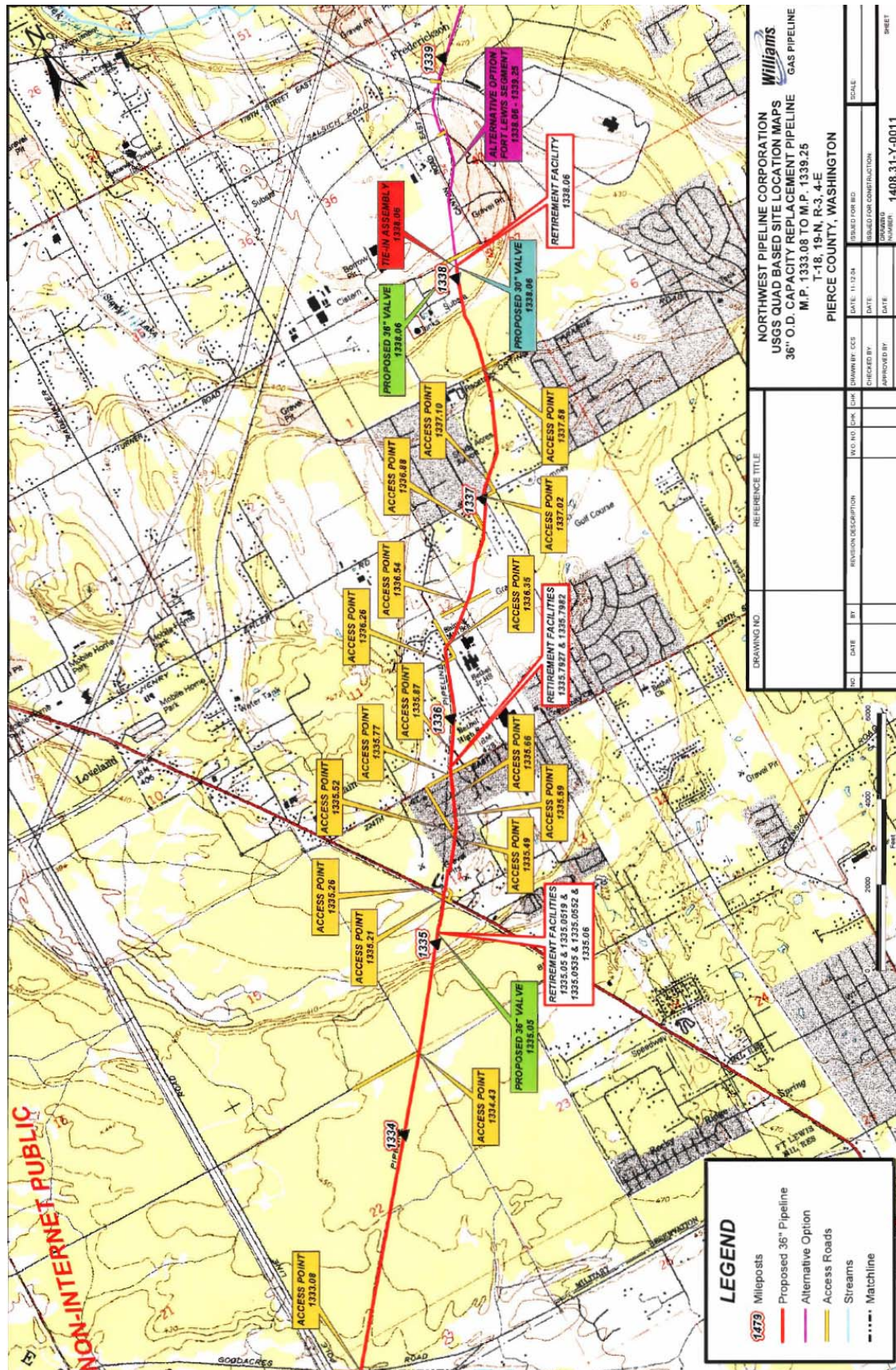


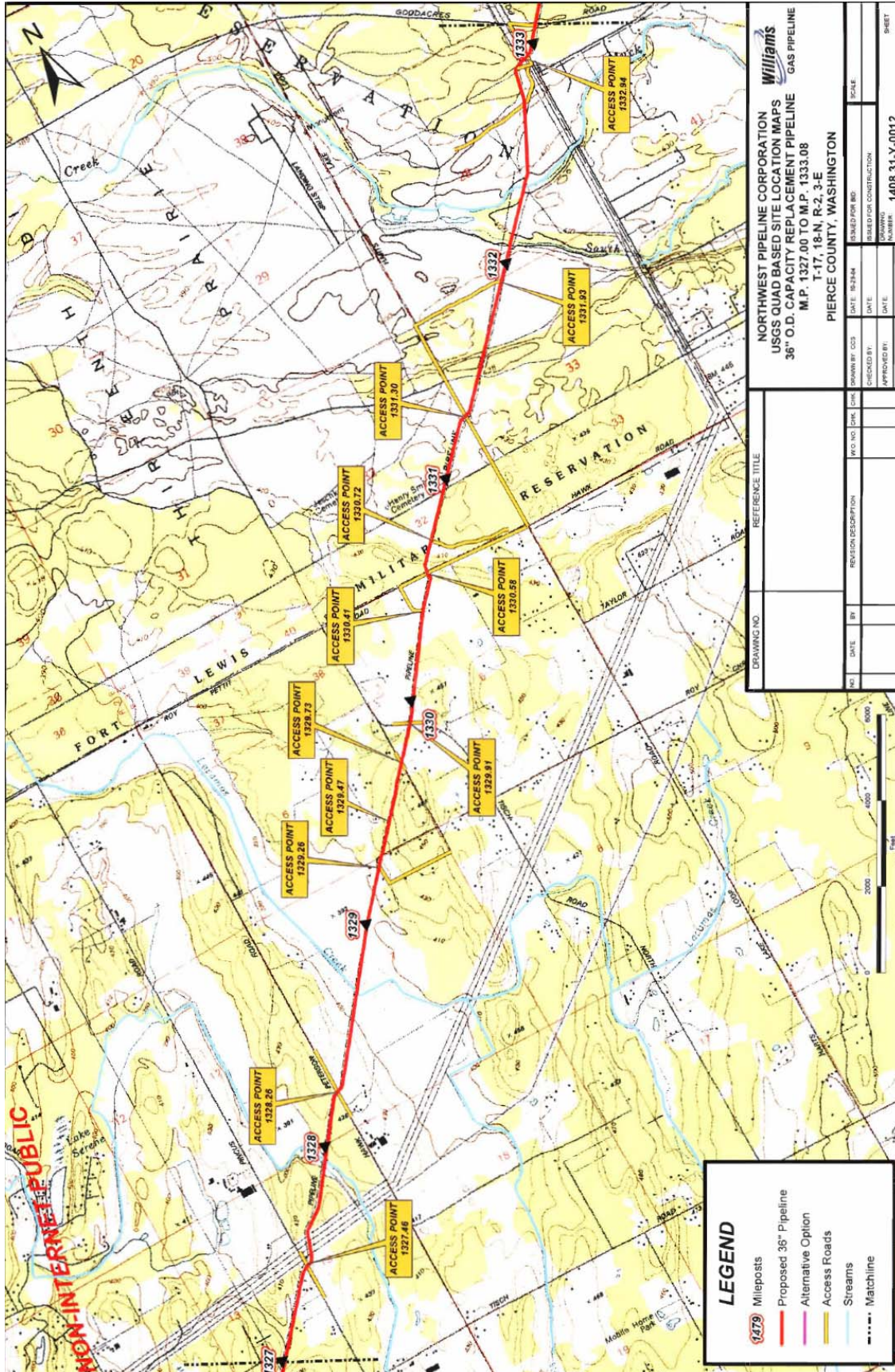


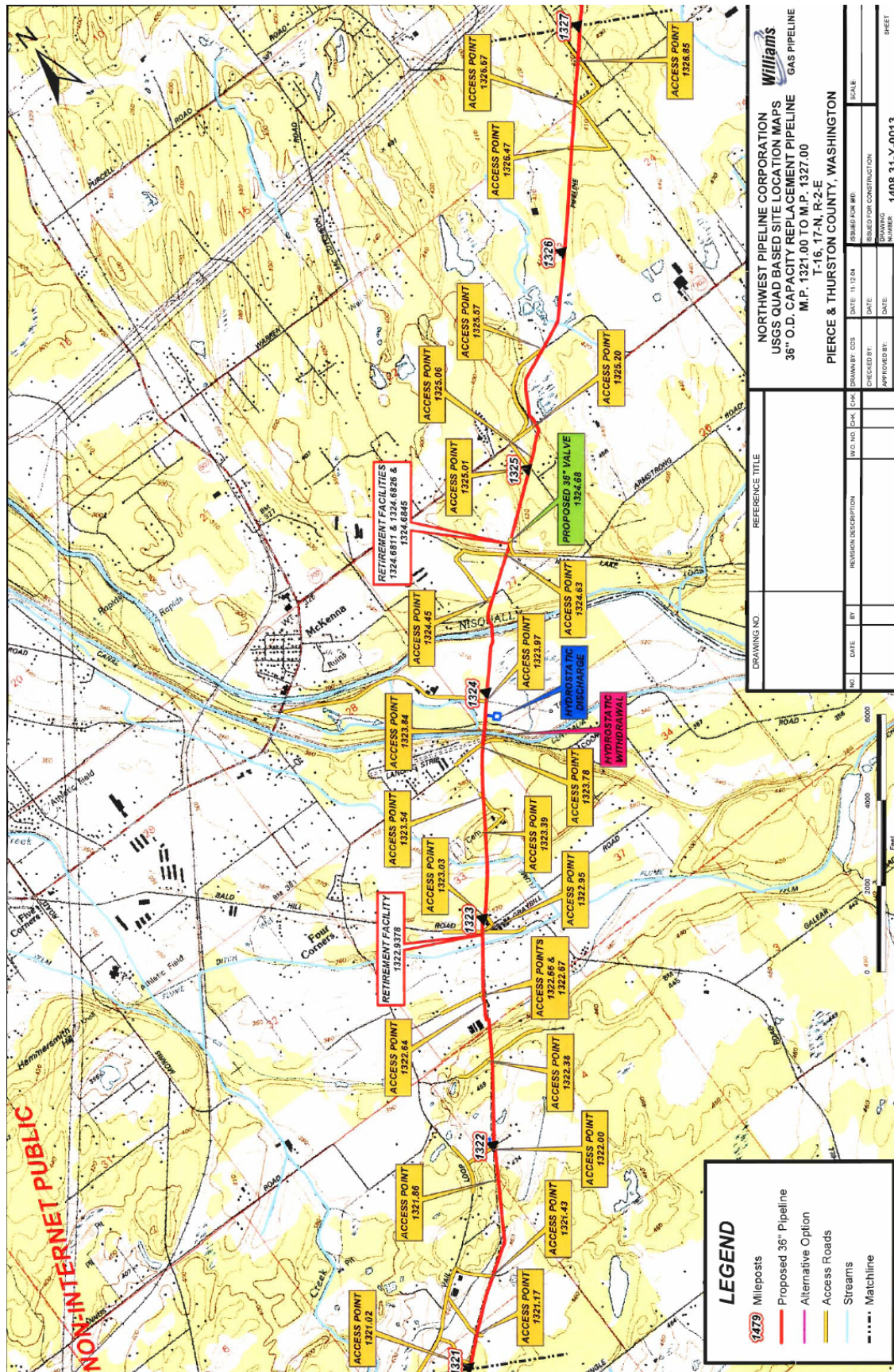


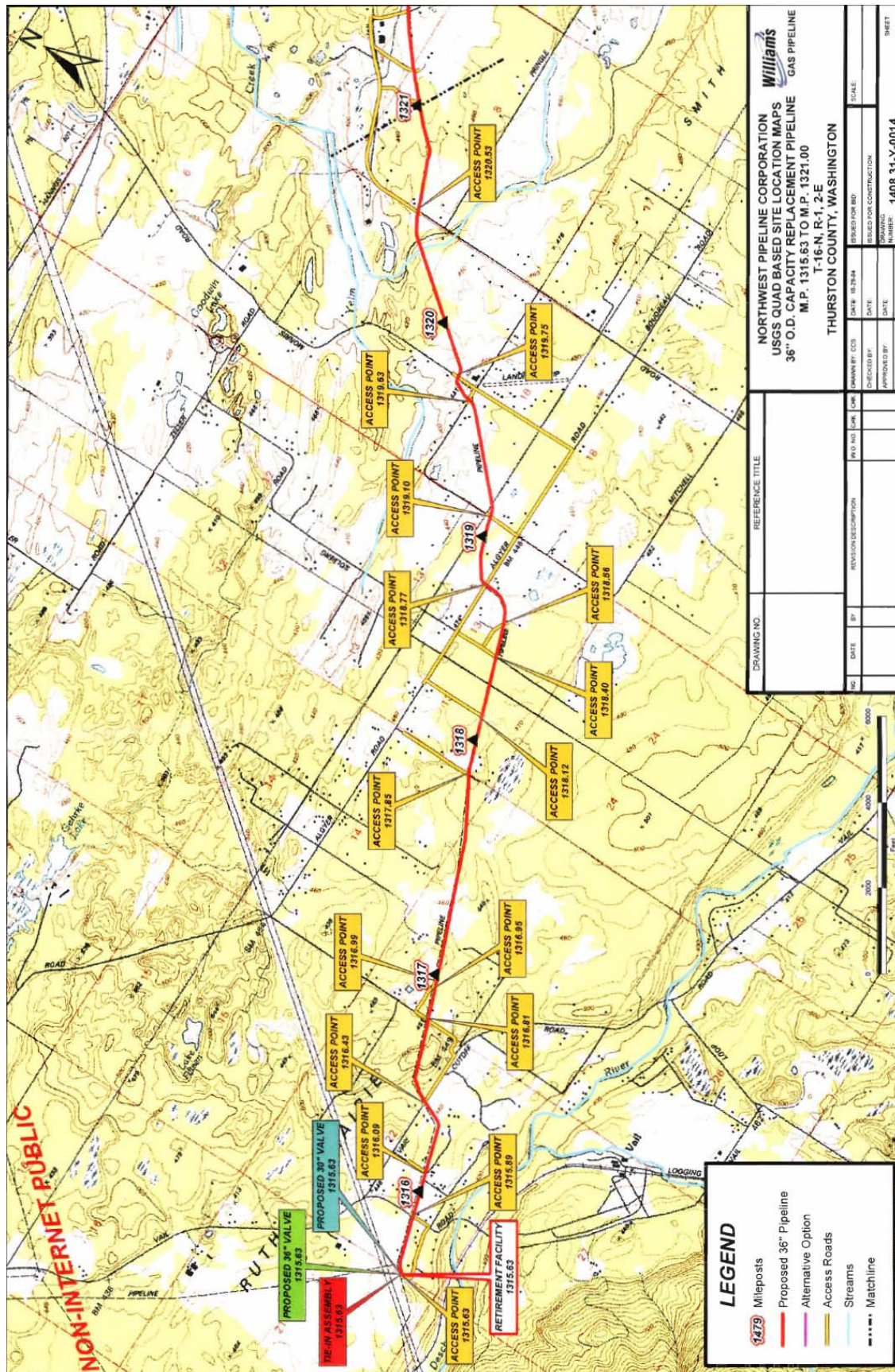












APPENDIX D—RESPONSE TO COMMENTS

Comment #1:

Northwest plans to have all storm water and dewatering water infiltrate to the ground through the use of adequate BMPs thus preventing water from channeling to surface waters. Under normal operations, there would be no "distinct point of discharge" from the site to surface waters or storm drains as described on page 8. Northwest understands that in the event there is some channeling to surface waters, effluent monitoring would be required. Therefore, Northwest believes monitoring discharges to ground water is inappropriate since it does not affect surface water quality standards.

Response #1:

This permit has been issued under federal and state regulatory authority: the Federal Water Pollution Control Act and the State of Washington Water Pollution Control Law (RCW 90.48.160—please refer to the cover page of the permit). The state regulatory authority requires environmental monitoring of groundwater discharges. State waste discharge permit program is applicable to the discharge of waste materials from industrial, commercial, and municipal operations into ground and surface waters of the state (Chapter 173-216 WAC). The Water Quality Standards for Ground Waters of the State of Washington can be found in Chapter 173-200 WAC. Discharges to ground water must be monitored in order to determine the impacts to state ground water and to ensure best management practices are used and maintained.

Comment #2:

Regarding the Effluent Limitations on Page 6, Northwest is assuming that a discharge to surface water by either stormwater runoff or dewatering water is one that channels and ultimately reaches surface water. Northwest does not anticipate this project will result in a "discharge" to ground water unless a discharge to ground water is considered infiltration of either stormwater runoff or dewatering water, which Northwest understands to be Ecology's preference.

Response #2:

Please refer to permit condition S1.C, page 6 of the permit, for explanation on Discharges to the Ground Water.

“Any discharge to a pond, lagoon, or other type of impoundment or storage facility that is unlined is considered a discharge to *ground water* and is subject to the *ground water* quality standards (Chapter 173-200 WAC)”

Comment #3:

Only in an upset condition would construction storm water or dewatering water channel to surface water, and therefore, Northwest does not believe monitoring effluent for turbidity is warranted. However, we do feel that turbidity in the receiving water is reasonable.

Response #3:

Under all those conditions where Northwest Pipeline Corporation is discharging construction stormwater and dewatering water to the waters of the state or ground water, Northwest Pipeline Corporation is required to monitor and submit DMRs in accordance with the permit requirements. However, when Northwest Pipeline Corporation is not discharging to the waters of the state or ground water, they are only required to submit the DMR forms indicating “No Discharge.” Please refer to permit condition S4.A.

Comment #4:

Northwest anticipates that storm water on disturbed soil will primarily remain within the construction right-of-way as controlled by BMPs and will not cause a discharge from the site. Therefore, there would be no need to monitor this water. However, in the event that storm water would get off the right-of-way and channel ultimately reaching surface waters, Northwest would sample the effluent and the receiving water according to the effluent limitations for discharges to surface water and wetlands on page 6. As stated above, Northwest does not understand the requirement to sample turbidity in the effluent.

Response #4:

Please see the response to comment #3.

Comment #5:

As for storm water, should the dewatering water channel to surface water, the effluent would be monitored according to the effluent limitations for discharges to surface water and wetlands on page 6.

Response #5:

The Department concurs with Northwest Pipeline Corporation.

Comment #6:

Under what circumstances would storm water and dewatering water require effluent monitoring for discharges to ground water?

Response #6:

Please refer to permit condition S1.C, page 6 of the permit, for explanation on Discharges to the Ground Water.

“Any discharge to a pond, lagoon, or other type of impoundment or storage facility that is unlined is considered a discharge to *ground water* and is subject to the *ground water* quality standards (Chapter 173-200 WAC)”

Northwest Pipeline Corporation is required to monitor all the above-mentioned discharges to the ground water.

Comment #7:

It will be impossible to determine the volume of storm water or dewatering water that either remains within the construction right-of-way and infiltrates or that leaves the construction right-of-way and infiltrates to the ground. The draft permit does not clearly state the requirement for monitoring of volume during effluent monitoring.

Response #7:

Measurement of volume for groundwater discharges is not required.

Comment #8:

Construction storm water at compressor stations that would be diverted to a storm water pond could be monitored as described on page 7 - Effluent Limitation: Discharges to Surface Water and Wetlands. However, storm water and dewatering water at compressor stations that does not leave the site and infiltrates to the ground cannot possibly be monitored as described on page 7 – Effluent Limitations: Discharges to Ground Water.

Response #8:

“Construction storm water at compressor stations that would be diverted to a storm water pond could be monitored as described on page 7 - Effluent Limitation: Discharges to Surface Water and Wetlands.”

This statement is correct only if the stormwater pond is lined, and the stored water is directed to the surface water. If the pond is unlined or if the stored water is discharged to ground water through infiltration, please use “Effluent Limitation: Discharges to Ground Water.” If it is possible to effectively infiltrate construction storm water or dewatering water at compressor stations without any need for storage at a stormwater storage structure, Northwest Pipeline Corporation is not required to monitor. Prior to discharging to ground water, Northwest Pipeline Corporation is required to study the feasibility of infiltration areas. Permit language has been modified to clarify this requirement.

Comment #9:

Please provide a definition of "soil stabilization BMP implementation" as described in S3.B of the draft permit.

Response #9:

Soil stabilization practices help prevent erosion that contributes sediment to storm water. Typical stabilization practices include seeding, mulching, geotextiles, sod stabilization, vegetative buffer strips, protection of trees, preservation of mature vegetation, and decreasing slope angles or lengths. Please refer to Department’s February 2005 *Stormwater Management Manual for Western Washington (SWMM)* for further reference.

Comment #10:

Page 17 discusses the requirement for a Construction Storm Water/Dewatering Monitoring Plan. It states that the SWPPP shall contain a detailed monitoring plan, including monitoring of discharges and the receiving water. Northwest notes that there are no planned discharges associated with construction storm water or dewatering water. All storm water is intended to remain on the construction right-of-way and infiltrate to the ground, and all dewatering water is intended to infiltrate to the ground. In the unlikely event that this water channels to surface water, the monitoring plan will contain provisions for monitoring of the receiving water but this is very unlikely to occur.

Response #10:

The Department understands that it is Northwest Pipeline Corporation's intent to discharge most of the construction stormwater and dewatering water to the ground water through infiltration. But at the same time Northwest Pipeline Corporation acknowledges that due to some unlikely events there may be discharges to the surface water. For a project of this magnitude it is reasonable to require monitoring plan that include monitoring of discharges and the receiving waters.

Comment #11:

Page 17 also requires a Spill Prevention and Emergency Cleanup Plan to included in the SWPPP. A Spill Prevention, Containment, and Countermeasures Plan (SPCC) was included as Appendix F in the General SWPPP. The modifications required by Ecology's 401 Water Quality Certification were included in the SPCC Plan, and the revised SPCC Plan was provided to Ecology in the HDD Implementation Plan. Page 16 in the Fact Sheet states the same requirement.

Response #11:

Thanks for submitting the required information.

Comment #12:

The last sentence of the second paragraph from the bottom of Page 15 discusses a point of compliance for turbidity. Because Ecology's 401 Water Quality Certification also establishes the points of compliance for turbidity based on the cfs of streams, Northwest suggests that the sentence be replaced with a reference to adhering to the requirements in Ecology's 401 Water Quality Certification.

Response #12:

The point of compliance within the 401 is for in-water activities only per WAC 173-201A and is not intended for upland discharges. The individual NPDES permit establishes the point of compliance for upland discharges.

Comment #13:

Contrary to the column heading in Table 1, Northwest does not propose any "ouffalls" or "discharges" to receiving waters.

Response #13:

As per the information provided to the Department of Ecology, Northwest Pipeline Corporation acknowledges that there may be discharges to the surface water. This project involves a total of 154 water bodies, including 55 perennial water bodies and 99 intermittent streams or ditches. The construction activities will directly impact the population of six different counties. For the project of this magnitude, it is reasonable to identify the potential outfall locations and receiving bodies in the permit.

Comment #14:

Page 19, S1.B. Discharge Prohibitions states "At no time is runoff or sheet flow allowed to flow into rivers, streams, lakes, ponds, wetlands, or other surface bodies." This language was included in the original 401 Water Quality Certification issued by Ecology. However, in a letter dated October 21, 2005 from Ecology to Northwest Pipeline Corporation, it was clarified that "this applies only to hydrostatic test water that has not been treated." Northwest requests that the language in the NPDES Permit be changed to be consistent with the 401 Water Quality Certification. The same language should be clarified on Page 17 of the Fact Sheet (second paragraph).

Response #14:

The Department is concerned with the effect of discharges of large flow volumes to surface waters which could result in erosion and scouring. The Department has determined that the disposal method consistent with the "all known, available and reasonable methods of prevention, control, and treatment: (AKART) requirement for large hydrostatic test water discharges is infiltration. The treatment largely depends on water being slowly percolated through soils. The Department recognizes that minor seepage through the hay bale containment structure may occur. Nevertheless, hydrostatic test water should be infiltrated into soils to the maximum extent possible. Best management practices (BMPs) listed in S5, page 24 of the permit, should be employed to result in release of the hydrostatic test water slowly, and in a controlled manner to the hay bale structure, and requires that these BMP structures be functional before discharging to them. To clarify the existing language listed in S1.B of the permit on page 19, the Department proposes the following new language which reads: "At no time is discharge of hydrostatic test water (other than as minor seepage through the hay bale containment structure) allowed to flow into rivers, streams, lakes, ponds, wetlands, or other surface water bodies. Such minor seepage shall not result in erosion or scouring of the rivers or creeks. The volume of the discharge shall not exceed 10 percent of the river or creek flow at the time of the discharge. Such discharges shall not result in a visible increase in turbidity in the receiving water."

Comment #15:

In response to S2.C, NW measures the amount of water by calculating the volume held in the pipe section.

Response #15:

Calculating, as opposed to metering, the volume of the discharge is acceptable. Flow measurement requirements under S2.C will be removed from the permit.

Comment #16:

Special Condition S4.2.a requires a specific SWPPP to be developed for each length of pipeline tested prior to any discharge relating to this project. Northwest intends to develop a site-specific SWPPP for each of the four pipeline loops. Hydrostatic test locations and potential discharge points will be addressed in each of the site-specific SWPPPs, however, it is not possible to write a specific SWPPP for each length of pipeline tested. The length to be tested depends on topography and other design issues once the pipeline is installed and therefore, the exact lengths to be tested are not known prior to construction. Northwest requests that Ecology change the language in the draft permit from "each length of pipeline tested" to "each loop."

Response #16:

The Department agrees with your comments. The language in S4.2.a will be changed to read "specific SWPPP to be developed....for each loop of pipeline tested..."